

Ms. Carmen Santos U.S. Environmental Protection Agency, Region 9 Mail Code WST-5 75 Hawthorne Street San Francisco, California 94105 ARCADIS U.S., Inc. 2000 Powell Street 7th Floor Emeryville, CA 94608 Tel 510.652.4500 Fax 510.652.4906 www.arcadis-us.com

ENVIRONMENT

Subject:

Revised PCB Cleanup Completion Report, College for Certain, 1009 66th Avenue, Oakland, California

Dear Ms. Santos:

On behalf of Aspire Public Schools (Aspire) and College for Certain, LLC (CFC), ARCADIS U.S., Inc. (ARCADIS) has prepared this report to provide additional information regarding the remediation of soil containing polychlorinated biphenyls (PCBs) at the Former Pacific Electric Motors Facility located at 1009 66th Avenue in Oakland, California (Site; Figures 1 and 2). The majority of the environmental work was conducted by LFR Inc. (LFR), on behalf of CFC. LFR was purchased by ARCADIS in December 2008 and became fully integrated into ARCADIS in January 2010.

The remedial tasks conducted at the Site were completed in accordance with 40 Code of Federal Regulations (CFR) §761.125(c)(5) that describes the implementation of the Toxic Substances Control Act (TSCA) Self-Implementing Cleanup Plan (SICP). The scope of work for the SICP was presented in a letter from LFR to the U.S. Environmental Protection Agency (USEPA), dated October 23, 2009 and prepared for Aspire (LFR 2009c). ARCADIS submitted a report entitled "Implementation of the Toxic Substances Control Act Self-Implementing Cleanup Notification at the Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California" on August 12, 2010 (Implementation Report; Attachment 6; ARCADIS 2010a). The Implementation Report documented the remedial actions that took place as outlined in the SICP.

Following the submittal of the Implementation Report, additional remedial tasks associated with the SICP were conducted at the Site as part of the redevelopment of the Site from November 2010 to August 2011. In addition, ARCADIS prepared and submitted a draft Operations and Maintenance Plan (O&M Plan) and deed notice for the Site in October 2011 (a Revised O&M Plan is included as Attachment 5 and a Revised Land Use Covenant and Environmental Restriction is being submitted under separate cover). Following review of these draft documents, the USEPA requested

Date:

May 2014

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Our ref:

EM009155.0016

the following information to document the additional remedial tasks that were completed at the Site:

- Summary of additional remedial actions conducted following the submittal of the Implementation Report;
- A summary of the PCB-containing soil that remains at the Site;
- Summary of mitigation measures for the PCB-containing soil that remains at the Site:
- Soil sample laboratory analytical data (Attachment 1);
- Revised health risk screening calculations (Attachment 2);
- Fill material source information and laboratory analytical data (Attachment 3);
- Waste disposal information (Attachment 4); and
- Revised figures showing:
 - Details regarding the surface cap, the landscaped areas, and the redevelop plan (Figure 3);
 - Survey coordinates for the location of soils beneath the cap containing PCBs at concentrations above the cleanup level of 0.130 milligrams per kilogram (mg/kg; Figure 3); and
 - Areas where cleanup levels were achieved, where the cleanup levels were not achieved, and where soils contaminated with PCBs above the cleanup level were consolidated beneath the cap at depths ranging from approximately 1 to 4 feet below the current ground surface (see Figure 3).

Therefore, this report, along with the Implementation Report, provides a comprehensive summary of the SICP.

The Site has been redeveloped into the Aspire Golden State College Preparatory Academy, which serves grades 6 through 12 and has capacity for 570 students; the



school opened in August 2011. The school occupies approximately 1.4 acres and consists of:

- 3 two-story buildings (approximately 41,430 square feet total including 24 full-sized classrooms, 4 labs, 3 girls and 3 boys restrooms, and 4 staff restrooms);
- An asphalt-paved parking area with access via two driveways on 66th Avenue (one for ingress and one for egress);
- An asphalt-paved area for basketball; and
- Several planter areas.

Post-Demolition Surface Soil Samples

Post-demolition surface soil samples (PD-1 to PD-7) were collected in May 2010 within the footprint of the two buildings that were demolished at the Site and analyzed for PCBs. The purpose of these samples was to document the surface soil quality following the demolition of the two buildings. As indicated in Table 1 below, six of the post-demolition surface soil samples contained PCBs at concentrations that exceeded the site-specific cleanup goal of 0.130 mg/kg. Laboratory reports for these samples are included as Attachment 1. Figure 4 illustrates the locations of these samples.

Table 1
Post-Demolition Surface Soil Samples
concentrations in mg/kg

Sample ID	Notes	Date	PCBs
PD-1	1, 2	05/28/10	0.372
PD-2	1, 2	05/28/10	0.940
PD-3	1, 3	05/28/10	0.344
PD-4	1, 3	05/28/10	0.321
PD-5	1, 3	05/28/10	0.209
PD-6	1, 2	05/28/10	0.535
PD-7		05/28/10	0.100
REGULATORY CONCENTE	RATIONS		
Soil Cleanup Goal			0.130

Notes:

- 1 Concentrations of PCBs are reported as a combination of Aroclor 1254 and 1260. Samples analyzed by Curtis & Tompkins Ltd. for PCBs using EPA Test Method 8082.
- 2 Denotes soil remains in place at the Site beneath the cap (see Figure 3).
- 3 Denotes soil near this sample was excavated and consolidated on site near soil sample locations W1-SDWall2' and W2-SDWall2' (see Figures 3 and 4).

Initially, soil represented by these post-demolition surface soil samples was to remain in place. However, in order to accommodate the redevelopment of the Site, soil in the vicinity of three of the sample locations (PD-3, PD-4, and PD-5) required excavation. An area measuring approximately 10 feet long by 10 feet wide by 2 feet below grade was excavated at each of the three sample locations - PD-3, PD-4, and PD-5 and consolidated on site (see excavation areas named EXC-PD3, EXC-PD4, and EXC-PD5 on Figure 4).

As described in the letter from ARCADIS to USEPA dated September 15, 2010 (ARCADIS 2010b), instead of hauling this excavated soil to a landfill for disposal, the soil that was excavated at these three locations was consolidated within the area along the western property boundary at soil sample locations W1-SDWall2' and W2-SDWall2' (see Figures 3 and 4). Approximately 20 to 25 cubic yards of soil from the three areas of excavation (EXC-PD3, EXC-PD4, and EXC-PD5) was consolidated within the area along the western property boundary that encompasses soil sample locations W1-SDWall2' and W2-SDWall2' (see Figures 3 and 4). The consolidated soil was placed at an elevation of approximately 2.5 to 3 feet set to the City of Oakland Vertical Datum, which is equivalent to approximately 5 feet below the surface of the pavement in this area of the Site. The excavation where the soil was placed was lined with Geotextile fabric and the encapsulated soil was also covered with Geotextile fabric prior to raising the grade and compacting the area.

In accordance with the methods provided in the SICP, confirmation soil samples were collected from the sidewalls and the base of excavations EXC-PD3, EXC-PD4, and EXC-PD5 (a total of five soil samples from each area) and analyzed for PCBs (see Figure 4). These confirmation soil samples were collected after the excavated soil was placed in the consolidation area (EXC-PCB3). The analytical results for these samples are provided in Table 2 (below). As indicated, PCBs were not detected in these confirmation soil samples at concentrations above the site-specific cleanup goal. Laboratory reports for these samples are included as Attachment 1.



Table 2
Post-Demolition Excavation
Confirmation Soil Samples

concentrations in mg/kg

Sample ID	Notes	Date	PCBs				
EXC-PD3- NORTH 2'		10/27/10	<0.012				
EXC-PD3- SOUTH 2'		10/27/10	<0.012				
EXC-PD3- EAST 2'		10/27/10	<0.012				
EXC-PD3- WEST 2'		10/27/10	<0.012				
EXC-PD3- BOTTOM 2'		10/27/10	<0.012				
EXC-PD4- NORTH 2'		10/27/10	<0.012				
EXC-PD4- SOUTH 2'		10/27/10	<0.012				
EXC-PD4- EAST 2'		10/27/10	0.016				
EXC-PD4- WEST 2'		10/27/10	<0.012				
EXC-PD4- BOTTOM 2'	1	10/27/10	0.063				
EXC-PD5- NORTH 2'		10/27/10	<0.012				
EXC-PD5- SOUTH 2'		10/27/10	<0.012				
EXC-PD5- EAST 2'		10/27/10	<0.012				
EXC-PD5- WEST 2'		10/27/10	0.030				
EXC-PD5- BOTTOM 2'		10/27/10	0.025				
REGULATORY CONCENTRATIONS	REGULATORY CONCENTRATIONS						
Soil Cleanup Goal			0.130				

Notes:

1 - Concentrations of PCBs are reported as a combination of Aroclor 1254 and 1260.Samples analyzed by TestAmerica Laboratories Inc. for PCBs using EPA Test Method 8082.

PCB-Containing Soil Remaining at the Site

Soil containing PCB concentrations above the cleanup goal of 0.130 mg/kg was left in place at the Site beneath the TSCA cap at 12 locations. The locations of the 12 soil samples that contain concentrations above the PCB cleanup goal of 0.130 mg/kg are illustrated on Figure 3.

The 12 soil samples listed in Table 3 contained PCBs at concentrations greater than 0.130 mg/kg and represent soil that remains in place beneath the TSCA cap (see Figure 3).

Table 3
Samples Contained PCBs at Concentrations Greater Than 0.130

Sample ID	Depth below TSCA Cap (in feet)	PCBs (in mg/kg)
50' North 1 - SDWALL1'	1.0	0.135
50' North 2 - SDWALL1'	1.3	0.160
50' North 3 - SDWALL1'	1.4	0.250
25' North 7 - SDWALL1'	1.3	0.330
S1-SDWALL 2' R1	1.2	0.230
NE-CORNER 3' R1	2.2	0.270
W1-SDWALL 2'	3.4	0.420
W2-SDWALL 2'	4.0	2.500
SW-Bottom 6' R2	3.9	0.370
PD-1	1.3	0.372
PD-2	1.4	0.940
PD-6	1.2	0.535

Notes: The depth of the samples below the TSCA Cap was established by subtracting the sample elevation from the finished floor elevation of the top of the TSCA cap.

Due to geotechnical work conducted to strengthen site soils for the redevelopment of the Site, the soil currently in those 12 locations may have been moved. Thus the PCB-containing soil may be at locations that are not represented by the samples collected in those locations before the geotechnical and grading work. The geotechnical work to strengthen the soil included the cement treatment of the upper 18 inches of soil across the Site. This may have resulted in the mixing and movement of soil at the 12 locations where PCBs were detected at concentrations greater than the cleanup goal with other soils at the Site.

ProUCL calculations prior to grading and geotechnical work at the Site demonstrated the 95% Upper Confidence Limit (UCL; 0.174 mg/kg total PCBs) was slightly higher than the cleanup level of 0.13 total PCBs. Figure 3 depicts the locations of the samples that contain PCBs at concentrations greater than 0.130 mg/kg prior to stabilization. PCBs remaining in soil were mitigated by construction of the cap (see the Mitigation Measures section below).

Soil represented by samples 50' North 1-SDWALL1', 50' North 2-SDWALL1', and 50' North 3-SDWALL1' is now located beneath the parking areas that serve as the TSCA cap (see Figure 3). In this area (from the top down) the cap consists of 2.5 inches of asphalt concrete (the ground surface) that was placed on top of 8 inches of imported

aggregate base rock that lies on top of the cement-treated soil (where the affected soil is located).

Soil represented by sample locations PD-1 and SW-Bottom 6'R2 are now beneath the "rat slab" that serves as the TSCA cap (see Figure 3). In this area (from the top down), the cap consists of 2 inches of cement rat slab that was placed on top of 4 inches of imported base rock that lies on top of the cement-treated soil (where the affected soil is located). This rat slab design was approved by USEPA in a letter to Aspire dated April 5, 2011.

Soil at sample location PD-2 is now beneath the pedestrian walkway that serves as the TSCA cap in this portion of the Site (see Figure 3). In this area (from the top down), the cap consists of 4 inches of Portland Cement (the ground surface) that was placed on top of 4 inches of imported base rock that lies on top of the cement-treated soil.

Soil at sample locations 25' North 7-SDWALL1', S1- SDWALL 2' R1, W1-SDWALL 2' (consolidation area), W2-SDWALL 2' (consolidation area), and PD-6 are now beneath the vehicle traffic area that serves as the TSCA cap in this portion of the Site (see Figure 3). In this area (from the top down), the cap consists of 3 inches of asphalt concrete (the ground surface) that was placed on top of 10 inches of imported base rock that lies on top of the cement-treated soil.

Revised Health Risk Screening Calculations

USEPA requested that the analytical results for the 15 excavation confirmation soil samples collected in October 2010 be included in the health risk screening calculations conducted for the Site. The revised spreadsheets that were used to calculate the revised 95% UCL and the Estimated Risk Based on Representative Concentrations are provided in Attachment 2. The revised 95% UCL for the concentration of PCBs remaining in place is 0.174 mg/kg; the estimated risk associated with this PCB concentration is 1.3 x 10⁻⁶ and the estimated hazard index (HI) for PCBs in soil is 1.3. The risk posed by PCBs in soil is mitigated by the TSCA cap constructed at the Site (i.e., the building slabs, the roads, and the sidewalks; see Figure 3 and the Mitigation Measures section below).

As provided in the Implementation Report, a human health risk screen was performed considering the soil that was left in place after the removal actions in the 0 to 2 feet below ground surface interval. This included analytical data for soil samples collected during the site characterization activities and post-removal confirmation soil

sampling events. Data associated with soil that was removed from the Site (i.e., excavated, transported, and disposed of off site) were removed from the data set. Therefore, the data set consists of only data associated with soils remaining on site. A list of the PCB in-place soil samples used for this evaluation is presented in Attachment 2.

Exposure point concentrations (EPCs) of the post-removal constituents of concern (COCs) were used to perform the human health risk screen. The COCs include arsenic, lead, total petroleum hydrocarbons, and PCBs. This report addresses the removal action associated with the PCBs only. The EPCs for the selected COCs were compared to Recommended Cleanup Goals presented in the Revised Corrective Action Plan (CAP; LFR 2009a). The USEPA software ProUCL Version 4.00.05 was used to perform the statistical evaluation. EPCs were calculated for COCs with a minimum of six detections. Maximum detected concentrations were used for COCs with fewer than six detections.

Details on the statistical evaluation and representative concentrations are included in Attachment 2.

Health Risk Screen

Comparisons were performed as follows for carcinogenic compounds:

$$RiskePC = \frac{EPC_{soil} \times T_{Risk}}{CUG}$$

Where:

RiskEPC = estimated risk for COC (target = 10⁻⁶) EPC_{soil} = exposure point concentration for soil T_{Risk} = target risk used for the CUG calculation (10⁻⁶) CUG = cleanup goal presented for the COCs in CAP



Comparisons were performed as follows for non-carcinogenic compounds:

$$HazardEPC = \frac{EPC_{soil}}{CUG}$$

Where:

Hazard EPC = estimated risk for Site (target = 1) EPC_{soil} = exposure point concentration for soil CUG = cleanup goal presented for the COCs in CAP

The estimated risk based on the health risk screen is 1.3×10^{-6} . PCBs are the only in-place COCs with an estimated risk greater than 1×10^{-6} . The estimated HI is 1.3. PCBs are the only in-place COCs with an estimated HI greater than 1.

Mitigation Measures

This section provides a summary of the mitigation measures that have been implemented at the Site.

TSCA Cap

In accordance with letters from the USEPA to CFC dated April 5, 2011 and June 16, 2011 (USEPA 2011a,b), the PCB-containing soil has been mitigated by installing a "modified TSCA cap" across the Site. Figure 3 is a map that illustrates the following:

- The redevelopment plan for the property
- The modified TSCA cap
- The locations and concentrations of PCBs detected in the soil samples that failed the cleanup criteria for PCBs and remain in place at the Site

Figure 3 is a map that illustrates all in-place PCB soil samples and Figure 4 illustrates samples that passed and failed the cleanup criteria. Figures 5A, 5B, and 5C illustrate in-place PCB soil samples for each area of the Site, in greater detail.



The cap has been installed at the Site as described below (from the bottom up to the ground surface). The TSCA cap is the mitigation measure that has reduced the HI to less than 1.

Trash Enclosure Area

- Native soil
- 18 inches of cement-treated native soil
- 6 inches of imported aggregate base rock
- 6 inches of Portland cement concrete

Pedestrian Walkway Areas - Concrete

- Native soil
- 18 inches of cement-treated native soil
- 4 inches of imported aggregate base rock
- 4 inches of Portland cement concrete

Vehicle Traffic Areas

- Native soil
- 18 inches of cement-treated native soil
- 10 inches of imported aggregate base rock
- 3 inches of asphalt concrete

Parking Areas

- Native soil
- 18 inches of cement-treated native soil
- 8 inches of imported aggregate base rock
- 2.5 inches of asphalt concrete

Pedestrian Walkway Areas - Asphalt

- Native soil
- 18 inches of cement-treated native soil
- 4 inches of imported aggregate base rock
- 2 inches of asphalt concrete

Landscaped Areas

- Native soil
- 18 inches of cement-treated native soil
- 10 inches of native soil

• 12 inches of imported top soil

As requested by USEPA (USEPA 2011b), samples of the imported soil to be used in the landscaped areas were collected and analyzed in accordance with the Soil Sampling Plan for imported soil for landscaping dated June 24, 2011 (ARCADIS 2011). According to information provided by the general contractor, the soil used in the landscaped areas was imported to the Site from West Coast Sand and Gravel from R&B Materials Supply located in Manteca, California.

Two soil samples and one duplicate soil sample of the imported soil were collected and analyzed for PCBs, lead, arsenic, total petroleum hydrocarbons as gasoline (TPHg), and benzene on August 4, 2011. The analytical results for these samples are provided in the laboratory report that is included as Attachment 3. Lead and arsenic were detected in each of the three soil samples and PCBs were detected in one sample at 0.024 mg/kg. TPHg and benzene were not detected at concentrations above the laboratory reporting limit (see Attachment 3). The results of these analyses indicated that the concentrations of lead, arsenic, and PCBs detected in the soil samples were less than the cleanup goals established for the Site and the soil was imported to the Site.

TSCA Cap Inspection

The TSCA cap will be visually inspected annually for cracks or differential settlement. The inspection procedures are described in detail in the O&M Plan and deed notice for the Site dated October 2011. The inspections will be conducted by a California-licensed Engineer or Geologist. The results of the inspections will be documented in a brief summary letter that will include photographs and a map. The letters will be transmitted to the USEPA for review and comment.

All identified cracks or settlements will be repaired by a California-licensed General Engineering Contractor to provide equipment and experienced personnel to conduct the excavation work. The personnel will have the appropriate Occupational Safety and Health Administration training for sites with affected soil and groundwater (HAZWOPER). Repair activities will be directed by individuals working under the direct supervision of a California Professional Geologist or Professional Engineer. Soil generated through the repair activities will be handled in accordance with the Soil Management Plan (Attachment 5). The repairs will be documented in a brief summary letter that will include photographs and a map.



PCB-Containing Soils and Materials Disposal

Three in-situ soil samples collected at the Site contained PCBs at concentrations greater than 50 mg/kg (LFR 2006). Because of these in-situ soil samples U.S.EPA was contacted and included to provide regulatory oversight for the TSCA issues related to the PCB-containing soil. Specifically, in-situ soil sample 4B collected approximately 0.5 feet below the ground surface near excavation EXC-PCB1 in March 2005 contained PCBs at 69.68 mg/kg (LFR 2006). In-situ soil samples B-8 and B-13, collected approximately 0.5 feet below the ground surface in the northern corner near the location where PCB-containing soil was excavated in 1992, contained PCBs at 960 and 45,470 mg/kg (Pacific Electric Motors 1993). Based on this data for the in-situ soil samples, excavated soil from excavation EXC-PCB1 and soil excavated in the area near the excavation that took place in 1992 (within excavation EXC4) were transported and disposed of as a hazardous waste at Waste Management's Kettleman Hills Landfill. The final extent of each excavation at the Site was determined by a combination of site-representative concentrations (95% UCL of residual concentrations). The original expected total volume of known affected soil to be excavated was approximately 1,250 in-place cubic yards. The results of the confirmation soil samples collected from excavation areas EXC1, EXC2, EXC4, PCB-EXC1, PCB-EXC2, PCB-EXC3, and PCB-EXC4 resulted in a significant increase in the volume of soil that was removed from the Site. A total of approximately 8,400 tons of soil was removed from the Site.

In-situ soil samples collected from excavations EXC-PCB2, EXC-PCB3, EXC-PCB4, and EXC4 did not contain PCBs at concentrations greater than 50 mg/kg (ARCADIS 2011). Therefore, the soil from excavations EXC-PCB2, EXC-PCB3, EXC-PCB4, and EXC4 was transported and disposed of at Republic Services Keller Canyon Landfill located in Pittsburg, California. Soil from excavation EXC4 that was transported to the Keller Canyon Landfill was from areas located outside the area where the 1992 excavation of PCB-containing soil took place (i.e., where in-situ soil samples contained less than 50 mg/kg PCBs).

Due to elevated lead soluble threshold limit concentration results in soil samples collected from the combined excavation EXC1 and EXC2 (located near 66th Avenue), this soil was characterized as non-Resource Conservation and Recovery Act (RCRA) solid hazardous waste and transported for disposal at Chemical Waste Management's Kettleman Hills Landfill.

Table 4 below identifies soil disposal classifications, quantities, and destinations for PCB-containing soil. Copies of the PCB-containing soil waste manifests are included



in Attachment 4, in addition to weight summary reports for non-PCB-containing soils from the landfills. The soil included in these shipments is accounted for in Table 4 below, and the PCB-containing soil summary table included in Attachment 4. The removal action for the PCB-containing soil was documented in the letter report dated August 12, 2010 (ARCADIS 2010a).

Table 4
Soil Disposal Summary

Destination	Waste Classification	Volumes (tons)		
Kettleman Hills Landfill	PCB-TSCA (50 mg/kg & greater)	1,280.85		
Kettleman Hills Landfill	Non-RCRA (Lead)	1,977.83		
Vasco Road Landfill	Non-Hazardous	5,102.04		
Keller Canyon Landfill	Construction Debris (includes building demolition debris)	2,476.60		

In addition to the soil removal, PCB-containing building materials were also removed from the Site. Samples of the building materials that comprised the two warehouses that were demolished were collected in October 2009. These samples were collected and analyzed in accordance with the Sampling Plan for Building Materials provided in the letter from LFR to the USEPA, dated October 19, 2009 (LFR 2009b). Samples of the wood, paint, and concrete contained PCBs at concentrations up to 13 mg/kg (i.e., all less than 50 mg/kg; see Test America laboratory reports for "Job Number: 720-23737-1" in Attachment 1).

Discreet samples from building materials that included window caulk, paint, roofing materials, and concrete were collected and submitted to a state-certified laboratory for PCB analysis using USEPA Test Method 8082. The laboratory reports for these samples are included on the CD that accompanies this report (Attachment 1). PCBs were present in concentrations above the laboratory reporting limits (up to 13,000 µg/kg; see Table 5 below) in the samples collected from window caulk, paint, and concrete at the Site. The demolition debris from the demolition of both structures, including but not limited to wood, metal, glass, and concrete, was consolidated on site and transported for disposal as bulk PCB remediation waste at Republic Services' Keller Canyon Landfill located in Pittsburg, California. Based on the weight tickets provided by Republic Services, a total of 2,476.60 tons of bulk PCB product waste (comprised of window calking and other building materials) and PCB remediation waste (concrete, metal, glass, and wood affected by PCBs) was disposed of at the Keller Canyon Landfill. The majority of this material was concrete. The weight summary report for these materials is provided in Attachment 4.



Table 5 Building Materials Confirmation Soil Samples

concentrations in μg/kg (micrograms per kilogram)

Sample ID	Date	PCB 1016	PCB 1221	PCB 1232	PCB 1242	PCB 1248	PCB 1254	PCB 1260
Sample ID	Date	1010	1221	1232	1242	1240	1234	1200
Roof Bldg 1	10/29/09	<290	<290	<290	<290	<290	<290	<290
Floor Caulk	10/29/09	<2,900	<2,900	<2,900	<2,900	<2,900	<2,900	11,000
Window Caulk	10/29/09	<500	<500	<500	<500	<500	<500	2,400
Window Paint Bldg 1	10/29/09	<5,800	<5,800	<5,800	<5,800	<5,800	<5,800	13,000
Paint Bldg 1	10/29/09	<300	<300	<300	<300	<300	<300	340
Concrete Cap	10/29/09	<50	<50	<50	<50	<50	<50	89
Silver Paint Bldg 2	10/29/09	<290	<290	<290	<290	<290	<290	1,600

Note: Samples analyzed by TestAmerica Laboratories Inc. for PCBs using EPA Test Method 8082.



Table 6
Conditions of Approval Checklist

USEPA Conditions of Approval	proval Checklist Date of Completion/USEPA Approval				
Written, Signed Verification by Owner of	Presented on November 18, 2009;				
Aspire Property and Party Conducting	EPA conditional approval on November				
Cleanup	25, 2009 (via email)				
Pre-Demolition Survey	Presented on November 18, 2009; EPA conditional approval on November 25, 2009 (via email)				
Sampling and Analysis Plan	Presented on November 5, 2009;				
	EPA conditional approval on November 25, 2009 (via email)				
Sequence of Pre-Cleanup PCB Soil	Presented on November 18, 2009;				
Characterization; Pre-Demolition	EPA conditional approval on November				
Sampling (Building Materials); Soil	25, 2009 (via email)				
Remediation; and Soil Cleanup	,				
Verification					
PCB Remediation Waste; PCB Bulk	Presented on November 18, 2009;				
Product Waste; Cleanup Wastes; and	EPA conditional approval on November				
Disposal Requirements	25, 2009 (via email)				
Measures to Prevent Exposure of	Presented on November 18, 2009;				
Neighboring Communities to Airborne	EPA conditional approval on November				
Particulates	25, 2009 (via email)				
Cleanup Levels	Presented on November 18, 2009;				
	EPA conditional approval (via email) on				
	November 25, 2009; December 18,				
	2009, and January 21, 2010				
Cap (Protective Barrier)	Presented on April 25, 2011;				
	EPA approval on June 16, 2011				
Risk Management Plan and Deed Notice	Presented on October 15, 2013;				
	EPA approval pending				
Recordkeeping and PCB Cleanup	Presented on October 15, 2013;				
	EPA approval pending				
Restoration of the Site	Presented on October 15, 2013;				
	EPA approval pending				



We at ARCADIS appreciate working with you and your team and look forward to bringing this project to closure with the USEPA and Alameda County Department of Environmental Health in the very near future.

Sincerely,

ARCADIS U.S., Inc.

Ron Goloubow, P.G. Principal Geologist

Copies:

Angela Andrews - Aspire Public Schools Paresh Khatri - Alameda County Department of Environmental Health

Enclosures:

Figures

Figure 1 - Site Vicinity Map

Figure 2 - Site Plan

Figure 3 - Site Plan Showing Pavement Plan/Cap and In-Place Soil Exceeding PCB Cleanup Goals

Figure 4 - In-Place Soil Samples Compared to PCB Cleanup Goals

Figure 5A - Excavations PCB-1 and PCB-2 Soil Samples Compared To PCB Cleanup Goals

Figure 5B - Excavations EXC-1 and EXC-2 PCB Concentrations

Figure 5C - Excavations EXC-4, PCB-3, and PCB-4 PCB Concentrations

Attachments

Attachment 1 - Laboratory Analytical Data for Soil Samples (provided on CD)

Attachment 2 - Revised Human Health Risk Evaluation

Attachment 3 - Laboratory Analytical Data Report for Imported Soils

Attachment 4 - Waste Disposal Information

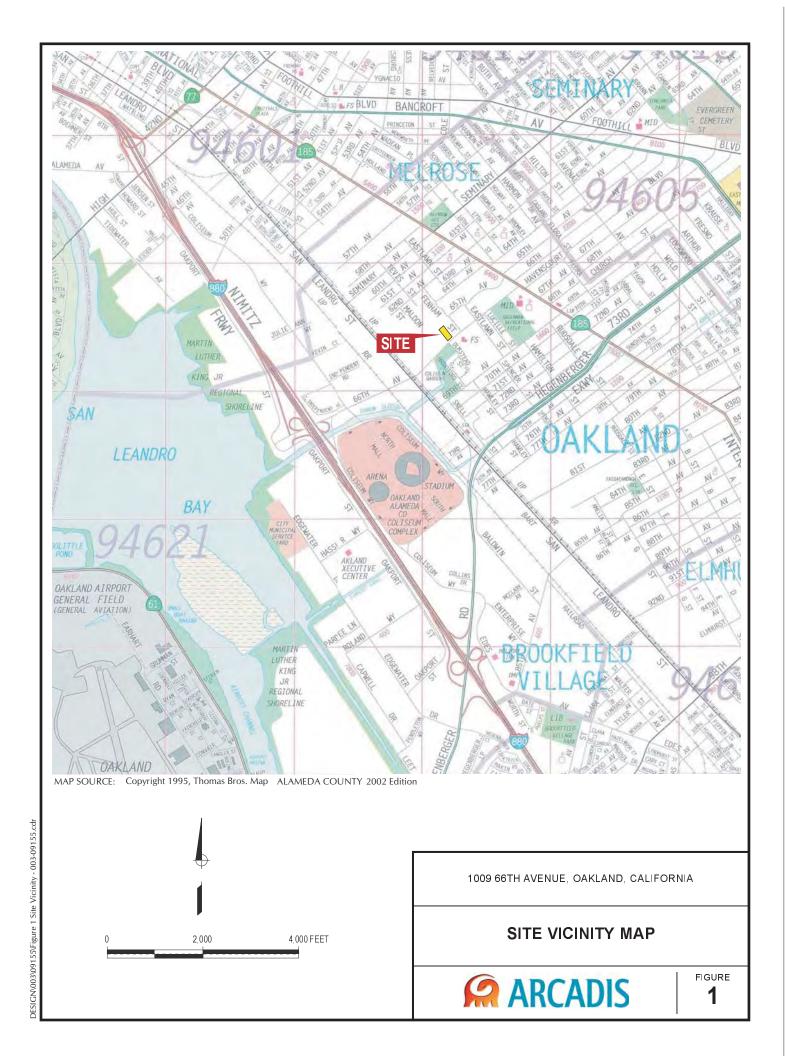
Attachment 5 - Operations and Maintenance Plan and Soil Management Plan

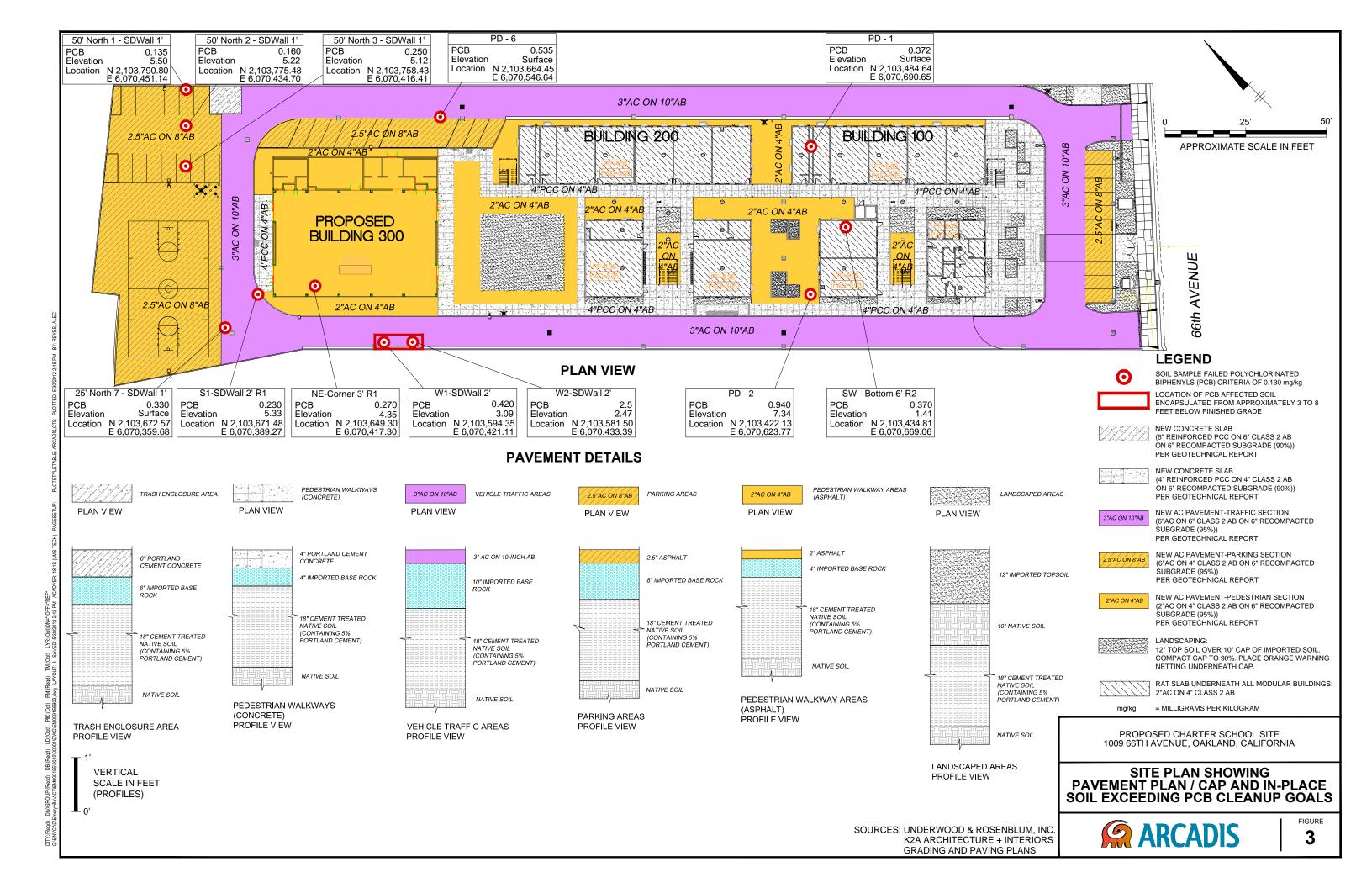
Attachment 6 - August 2010 TSCA Implementation Report

Attachment 7 - Correspondence with USEPA

References

- ARCADIS U.S., Inc. (ARCADIS). 2010a. Implementation of the Toxic Substances Control Act Self-Implementing Cleanup Notification at the Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California. August 12.
- ARCADIS. 2010b. Additional Excavation Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California. September.
- ARCADIS. 2011. Soil Sampling Plan for Soil to be Imported for Use in the Proposed Landscaped Areas at the Former Pacific Electric Motors Facility, 1009 66th Avenue, in Oakland, California. June.
- LFR Inc. (LFR). 2006. Soil Removal Action Work Plan, Proposed Aspire Charter High School, 1009 66th Avenue, Oakland, California March 14.
- LFR. 2009a. Revised Corrective Action Plan, Proposed Aspire School Site, 1009 66th Avenue, Oakland, California (Fuel Leak Case No. RO0000411). July 17.
- LFR. 2009b. 1009 66th Avenue, Oakland, California Soil and Concrete Sample Location Rational. October 19.
- LFR. 2009c. Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California. October 23.
- Pacific Electric Motors. 1993.PCB Contaminated Soil Clean-up. April 7.
- U.S. Environmental Protection Agency (USEPA). 2011a. Aspire Public School, 1009 66th Avenue, Oakland, California USEPA November 13, 2009 Approval of Polychlorinated Biphenyls Cleanup Notification under Toxic Substances Control Act New Request for Additional Cap Modification. April 5.
- USEPA. 2011b. Aspire Public School, 1009 66th Avenue, Oakland, California USEPA November 13, 2009 Approval of Polychlorinated Biphenyls Cleanup Notification under Toxic Substances Control Act New Request for Additional Cap Modification. June 16.





EXPLANATION:

Property Line

Former Warehouse Building

Ex

Excavation

Air Monitoring Station

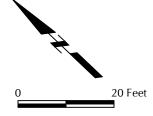
Post Demolition Surface Soil Sample (7 Locations - 6/2010)

Sidewall Confirmation Sample Location and ID

▲ Bottom Confirmation Sample Location and ID

Passed Polychlorinated Biphenyls (PCB) Criteria

Failed PCB Criteria

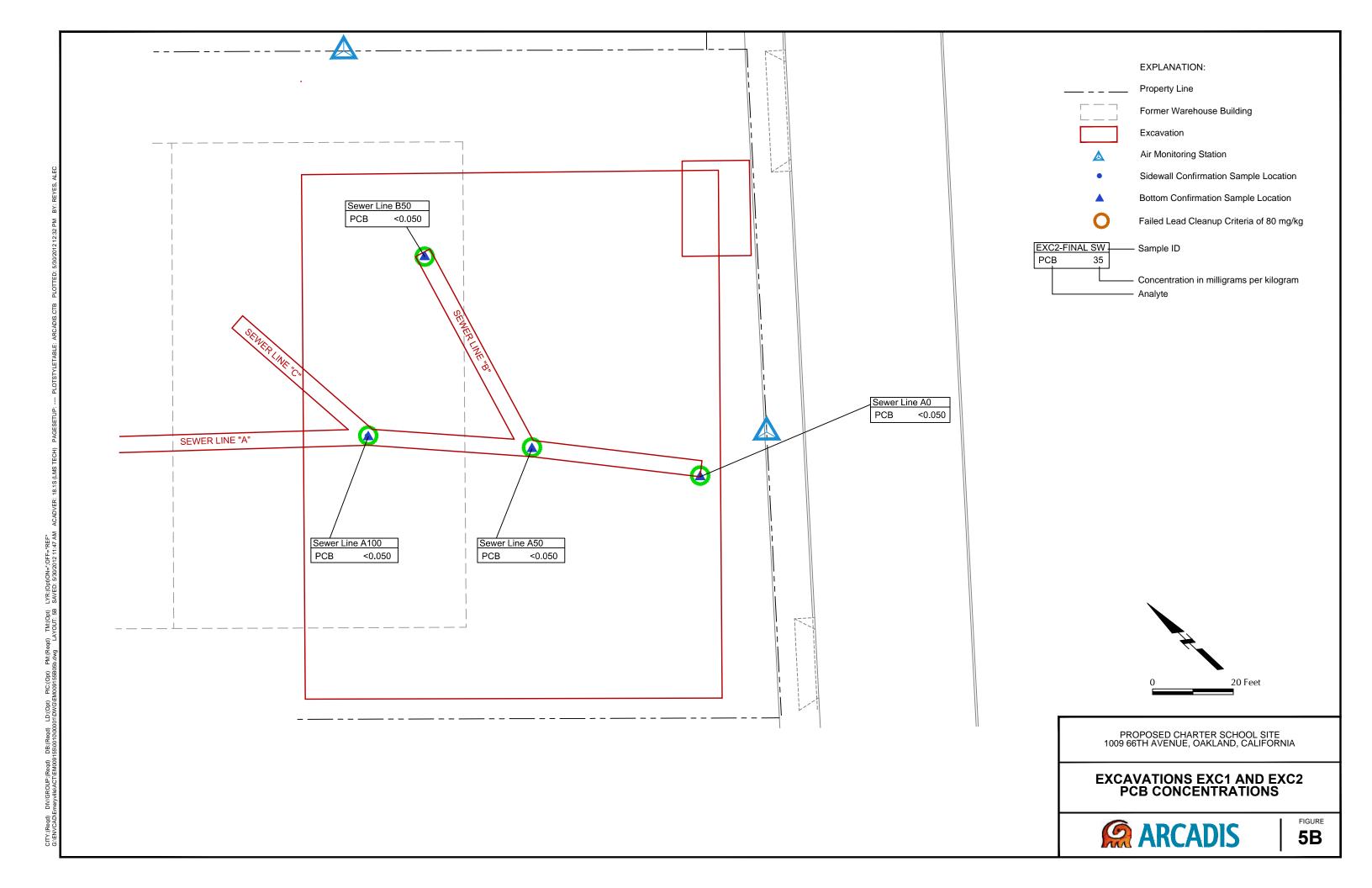


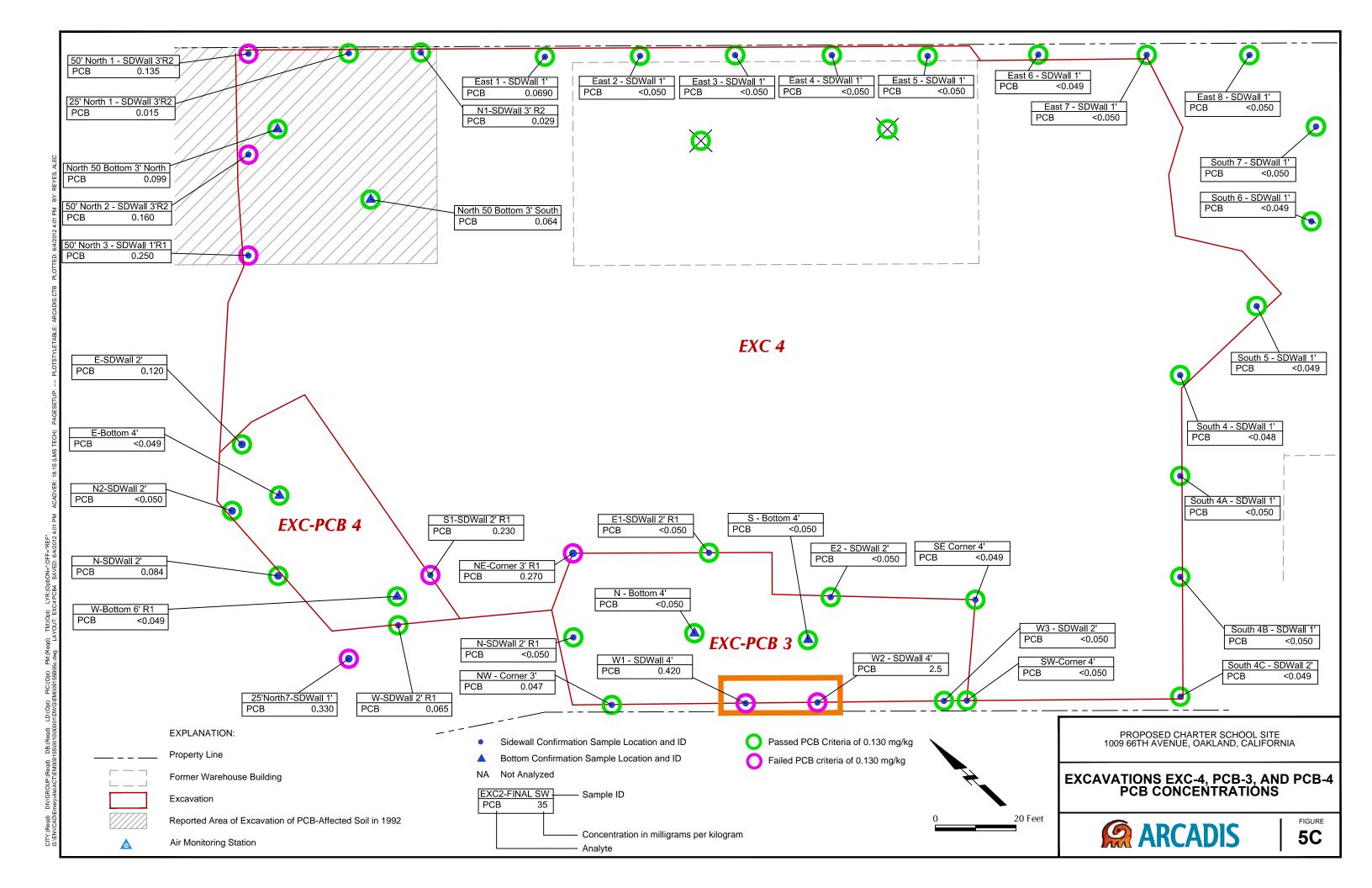
PROPOSED CHARTER SCHOOL SITE 1009 66TH AVENUE, OAKLAND, CALIFORNIA

EXCAVATIONS PCB-1 AND PCB-2 SOIL SAMPLES COMPARED TO PCB CLEANUP GOALS



FIGURE **5A**





Attachment 1

Laboratory Analytical Data for Soil Samples

(provided on Compact Disk)

Attachment 2

Revised Human Health Risk Evaluation

Human Health Risk Screen Comparison to Health Based Goals Aspire School Oakland, California Concentrations in milligrams per kilogram

			Estimated Risk	Estimated
		Post Removal Action	Based on	Hazard Based on
	Cleanup	Representative	Representative	Representative
COPC	Goal	Concentration	Concentration	Concentration
TPHd	450	138		0.31
TPHmo	800	894		1.1
benzo(a)pyrene	0.13	NA	NA	NA
Benzo(a)anthracene	1.3	NA	NA	NA
Benzo(k)fluoranthene	1.3	0.11	8.E-08	
chrysene*	21	0.19	9.E-09	
Naphthalene	2.8	NA	NA	NA
Benzene*	0.27	0.012	4.E-08	0.04
Arsenic	7	8.8		NA
Lead	80	62		NA
PCBs	0.13	0.17	1.3E-06	1.3
Totals			1.4E-06	3.E+00

^{*} Fewer than 6 detections; maximum concentration used for representative concentration NA = not applicable, no detections above analytical reporting limits

COPC = chemical of potential concern TPH = total petroleum hydrocarbon

General UCL Statistics for Full Data Sets

User Selected Options

Potential UCL to Use

From File WorkSheet.wst

Full Precision OFF

Confidence Coefficient 95% Number of Bootstrap Operations 2000

PCBs in Place at Aspire May 2012

General Statistics Number of Valid Observations	71	Number of Distinct Observations	18
Raw Statistics Minimum Maximum Mean Median SD Coefficient of Variation Skewness	0.94 0.0863		-4.605 -0.0619 -3.248 1.077
Relevant UCL Statistics Normal Distribution Test Lilliefors Test Statistic Lilliefors Critical Value Data not Normal at 5% Significance Level		Lognormal Distribution Test Lilliefors Test Statistic Lilliefors Critical Value Data not Lognormal at 5% Significance Level	0.369 0.105
Assuming Normal Distribution 95% Student's-t UCL 95% UCLs (Adjusted for Skewness) 95% Adjusted-CLT UCL (Chen-1995) 95% Modified-t UCL (Johnson-1978)	0.118 0.126 0.12	95% Chebyshev (MVUE) UCL 97.5% Chebyshev (MVUE) UCL	0.0936 0.115 0.135 0.174
Gamma Distribution Test k star (bias corrected) Theta Star MLE of Mean MLE of Standard Deviation nu star	0.727 0.119 0.0863 0.101 103.3		(0.05)
Approximate Chi Square Value (.05) Adjusted Level of Significance Adjusted Chi Square Value			0.118 0.118 0.117
Anderson-Darling Test Statistic Anderson-Darling 5% Critical Value Kolmogorov-Smirnov Test Statistic Kolmogorov-Smirnov 5% Critical Value Data not Gamma Distributed at 5% Signification Assuming Gamma Distribution 95% Approximate Gamma UCL	0.11	95% Bootstrap-t UCL 95% Hall's Bootstrap UCL 95% Percentile Bootstrap UCL	0.134 0.131 0.12 0.128 0.17 0.206 0.277
95% Approximate Gamma UCL 95% Adjusted Gamma UCL	0.11		

Use 95% Chebyshev (Mean, Sd) UCL

0.17

In-Place PCB Samples Aspire School Site Oakland, California

ProUCL processed

Sample ID	Date Sampled	PCBs mg/kg
EXC-PCB-1 N-SIDEWALL 2' WEST 2	11/10/2009	0.07
EXC-PCB-1 S-SIDEWALL 2' EAST	11/4/2009	0.03
EXC-PCB-1 S-SIDEWALL 2' WEST	11/4/2009	0.03
EXC-PCB-1 N-SIDEWALL 2' WEST	11/6/2009	0.03
EXC-PCB1 N-SDWALL-2'-EAST2	11/11/2009	0.03
EXC-PCB-1 E-SIDEWALL 2' NORTH	11/6/2009	0.03
EXC-PCB-1 E-SIDEWALL 2' SOUTH	11/6/2009	0.03
EXC-PCB1 E-SDWALL-2'-NORTH2	11/11/2009	0.03
EXC TPH/PCB1 S-SDWALL2'-EAST-R	11/18/2009	0.03
EXC TPH/PCB1 N-SDWALL2'-WEST-R	11/21/2009	0.03
EXC TPH/PCB1 S-SDWALL2'-WEST-R	11/18/2009	0.03
EXC TPH/PCB1 W-SDWALL2'-SOUTH-R2	11/24/2009	0.03
EXC TPH/PCB1W-SDWALL2'-NORTH-R	11/24/2009	0.03
EXC-PCB-2 W-SIDEWALL 2'	11/4/2009	0.03
EXC-PCB-2 E2-SIDEWALL 2'	11/10/2009	0.03
EXC-PCB-2 S-SIDEWALL 2'	11/4/2009	0.03
EXC-PCB-2 N-SIDEWALL 2'	11/4/2009	0.03
EXC PCB3-E1-SDWALL2'R1	12/8/2009	0.03
EXC PCB3-E2-SDWALL2'	11/23/2009	0.03
EXC PCB3-W3-SDWALL2'	11/23/2009	0.03
EXC PCB4-N-SDWALL2'	11/21/2009	0.08
EXC-PCB4-N2-SDWALL2'	11/21/2009	0.03
EXC PCB4-S1-SDWALL2'R1	12/8/2009	0.23
EXC PCB4-W-SDWALL2'R1	12/8/2009	0.07
EXC PCB4-E-SDWALL2'	11/21/2009	0.12
EXC4-50'NORTH3-SDWALL1'-R	11/30/09	0.25
EXC4-SOUTH3-SDWALL1'	11/21/09	0.03
EXC4-SOUTH4-SDWALL1'	11/21/09	0.02
EXC4-SOUTH5-SDWALL1'	11/21/09	0.03
EXC4-SOUTH6-SDWALL1'	11/21/09	0.03
EXC4-SOUTH7-SDWALL1'	11/21/09	0.03
EXC-4-South-4A-SDWALL1'	11/30/09	0.03
EXC-4-South-4B-SDWALL1'	11/30/09	0.03
EXC4-EAST1-SDWALL1'	11/21/09	0.69
EXC4-EAST2SDWALL1'	11/19/09	0.03
EXC4-EAST3SDWALL1'	11/19/09	0.03
EXC4-EAST4SDWALL1'	11/19/09	0.03
EXC4-EAST5SDWALL1'	11/19/09	0.03
EXC425'-North7-SDWallSDWALL1'	11/19/09	0.33
EXC4-EAST6-SDWALL1'	11/21/09	0.03

EXC4-EAST7-SDWALL1'	11/21/09	0.03
EXC4-EAST8-SDWALL1'	11/21/09	0.03
PD-1	05/28/10	0.37
PD-2	05/28/10	0.94
PD-3	05/28/10	0.34
PD-4	05/28/10	0.32
PD-5	05/28/10	0.21
PD-6	05/28/10	0.54
PD-7	05/28/10	0.10
Sewerline A-0	3/24/2010	0.03
Sewerline A-50	3/24/2010	0.03
Sewerline A-100	3/25/2010	0.03
Sewerline B-50	3/25/2010	0.03
Sewerline C-50	3/26/2010	0.03
PD3-EXC-NORTH 2'	10/27/2010	0.01
PD3-EXC-SOUTH 2'	10/27/2010	0.01
PD3-EXC-EAST 2'	10/27/2010	0.01
PD3-EXC-WEST 2'	10/27/2010	0.01
PD3-EXC-BOTTOM 2'	10/27/2010	0.01
PD3-EXC-NORTH 2'	10/27/2010	0.01
PD4-EXC-SOUTH 2'	10/27/2010	0.01
PD4-EXC-EAST 2'	10/27/2010	0.02
PD4-EXC-WEST 2'	10/27/2010	0.01
PD4-EXC-BOTTOM 2'	10/27/2010	0.06
PD5-EXC-NORTH 2'	10/27/2010	0.01
PD5-EXC-SOUTH 2'	10/27/2010	0.01
PD5-EXC-EAST 2'	10/27/2010	0.01
PD5-EXC-WEST 2'	10/27/2010	0.03
PD5-EXC-BOTTOM 2'	10/27/2010	0.03
EXC PCB3-N-SDWALL2'R1	12/8/2009	0.03
EXC-4-South-4C-SDWALL1'	11/30/09	0.03

Attachment 3

Laboratory Analytical Data Report for Imported Soils



THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica San Francisco 1220 Quarry Lane Pleasanton, CA 94566 Tel: (925)484-1919

TestAmerica Job ID: 720-36756-1 Client Project/Site: Aspire Oakland

For:

ARCADIS U.S., Inc 2000 Powell Street 7th Floor Emeryville, California 94608-1827

Attn: Mr. Ron Goloubow



Authorized for release by: 08/09/2011 12:54:54 PM

Afsaneh Salimpour Project Manager I

afsaneh.salimpour@testamericainc.com

Have a Question?

Ask
The

Expert

.....LINKS

Review your project results through

Total Access

Visit us at: www.testamericainc.com This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland TestAmerica Job ID: 720-36756-1

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Definitions/Glossary

Client: ARCADIS U.S., Inc TestAmerica Job ID: 720-36756-1

Project/Site: Aspire Oakland

Qualifiers
GC/MS VOA

F MS or MSD exceeds the control limits

Glossary

Abbreviation These commonly used abbreviations may or may not be present in this report.

Listed under the "D" column to designate that the result is reported on a dry weight basis.

EPA United States Environmental Protection Agency
ND Not Detected above the reporting level.

MDL Method Detection Limit RL Reporting Limit

RE, RE1 (etc.) Indicates a Re-extraction or Reanalysis of the sample.

%R Percent Recovery

RPD Relative Percent Difference, a measure of the relative difference between two points.

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Case Narrative

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland TestAmerica Job ID: 720-36756-1

Job ID: 720-36756-1

Laboratory: TestAmerica San Francisco

Narrative

Job Narrative 720-36756-1

Comments

No additional comments.

Receipt

All samples were received in good condition within temperature requirements.

GC/MS VOA

Method(s) 8260B: The matrix spike / matrix spike duplicate (MS/MSD) recoveries for sample -1 were outside control limits. The associated laboratory control sample (LCS) recovery met acceptance criteria.

No other analytical or quality issues were noted.

GC VOA

No analytical or quality issues were noted.

GC Semi VOA

Method(s) 8082A: The continuing calibration verifications (CCVs) for analytical batch 121853 exceeded control criteria for Aroclor 1260 on the confirmation column. All CCVs were in on the primary column and <40%D between columns for target compounds detected.LS-2 (720-36756-2)

No other analytical or quality issues were noted.

Metals

No analytical or quality issues were noted.

Organic Prep

No analytical or quality issues were noted.

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Detection Summary

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland TestAmerica Job ID: 720-36756-1

Client Sample ID: LS-1 Lab Sample ID: 720-36756-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Arsenic	1.8		0.98		mg/Kg	1		6010B	 Total/NA
Lead	2.6		0.49		mg/Kg	1		6010B	Total/NA

Client Sample ID: LS-2 Lab Sample ID: 720-36756-2

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
PCB-1260	24		16		ug/Kg	1		8082A	Total/NA
Arsenic	2.0		0.88		mg/Kg	1		6010B	Total/NA
Lead	4.1		0.44		mg/Kg	1		6010B	Total/NA

Client Sample ID: LS-2D Lab Sample ID: 720-36756-3

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fa	c D	Method	Prep Type
Arsenic	2.1		0.88		mg/Kg		1	6010B	Total/NA
Lead	4.7		0.44		mg/Kg		1	6010B	Total/NA

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Client: ARCADIS U.S., Inc TestAmerica Job ID: 720-36756-1

Project/Site: Aspire Oakland

Method: 8260B - Volatile Organic Compounds (GC/MS)

80

76

83

Client Sample ID: LS-1 Lab Sample ID: 720-36756-1

Date Collected: 08/04/11 14:35 **Matrix: Solid** Date Received: 08/05/11 10:30

MDL Unit Analyte RL Result Qualifier Dil Fac Prepared Analyzed 5.0 08/08/11 09:19 Benzene ND ug/Kg Surrogate % Recovery Qualifier Limits Prepared Analyzed Dil Fac 1,2-Dichloroethane-d4 (Surr) 81 69 - 120 08/08/11 09:19 69 - 122 08/08/11 09:19 Toluene-d8 (Surr) 84 79 67 - 120 08/08/11 09:19 4-Bromofluorobenzene (Surr)

Client Sample ID: LS-2 Lab Sample ID: 720-36756-2

69 - 120

Date Collected: 08/04/11 14:37 **Matrix: Solid**

Date Received: 08/05/11 10:30

Dibromofluoromethane

MDL Unit Analyte RL Result Qualifier Prepared Analyzed Dil Fac ND 5.0 08/08/11 10:37 Benzene ug/Kg Surrogate % Recovery Qualifier Limits Prepared Analyzed Dil Fac 69 - 120 1,2-Dichloroethane-d4 (Surr) 08/08/11 10:37 83 Toluene-d8 (Surr) 84 69 - 122 08/08/11 10:37 08/08/11 10:37 79 4-Bromofluorobenzene (Surr) 67 - 120 82 Dibromofluoromethane 69 - 120 08/08/11 10:37

Client Sample ID: LS-2D Lab Sample ID: 720-36756-3 Date Collected: 08/04/11 14:37 **Matrix: Solid**

Date Received: 08/05/11 10:30

4-Bromofluorobenzene (Surr)

Dibromofluoromethane

Analyte	Result Qualifier	RL	MDL Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND ND	5.0	ug/Kg			08/08/11 11:03	1
Surrogate	% Recovery Qualifier	Limits			Prepared	Analyzed	Dil Fac
Surrogate 1,2-Dichloroethane-d4 (Surr)	- % Recovery Qualifier 87	69 - 120		-	Prepared	Analyzed 08/08/11 11:03	Dil Fac

67 - 120

69 - 120

08/08/11 09:19

08/08/11 11:03

08/08/11 11:03

Client: ARCADIS U.S., Inc TestAmerica Job ID: 720-36756-1

Project/Site: Aspire Oakland

Method: 8015B - Gasoline Range Organics - (GC)

Client Sample ID: LS-1 Lab Sample ID: 720-36756-1

Date Collected: 08/04/11 14:35 Matrix: Solid

Date Received: 08/05/11 10:30

AnalyteResultQualifierRLMDLUnitDPreparedAnalyzedDil FacGasoline Range Organics (GRO)ND20ug/Kg08/06/11 14:371

-C5-C12

 Surrogate
 % Recovery
 Qualifier
 Limits
 Prepared
 Analyzed
 Dil Fac

 4-Bromofluorobenzene
 84
 51 - 117
 08/06/11 14:37
 1

 a,a,a-Trifluorotoluene
 93
 64 - 116
 08/06/11 14:37
 1

Client Sample ID: LS-2 Lab Sample ID: 720-36756-2

Date Collected: 08/04/11 14:37 Matrix: Solid

Date Received: 08/05/11 10:30

AnalyteResult
Gasoline Range Organics (GRO)Result
NDQualifierRLMDL
20Unit
ug/KgDPrepared
DAnalyzed
08/06/11 15:13Dil Fac
08/06/11 15:13

-C5-C12

 Surrogate
 % Recovery
 Qualifier
 Limits
 Prepared
 Analyzed
 Dil Fac

 4-Bromofluorobenzene
 83
 51 - 117
 08/06/11 15:13
 1

 a,a,a-Trifluorotoluene
 91
 64 - 116
 08/06/11 15:13
 1

Client Sample ID: LS-2D Lab Sample ID: 720-36756-3

Date Collected: 08/04/11 14:37 Matrix: Solid

Date Received: 08/05/11 10:30

AnalyteResult
Gasoline Range Organics (GRO)Result
NDQualifierRLMDL
20UnitDPreparedAnalyzedDil Fac08/06/11 15:481

-C5-C12

 Surrogate
 % Recovery Qualifier
 Limits
 Prepared
 Analyzed
 Dil Fac

 4-Bromofluorobenzene
 83
 51 - 117
 08/06/11 15:48
 1

 a,a,a-Trifluorotoluene
 92
 64 - 116
 08/06/11 15:48
 1

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Client: ARCADIS U.S., Inc TestAmerica Job ID: 720-36756-1

Project/Site: Aspire Oakland

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Client Sample ID: LS-1 Lab Sample ID: 720-36756-1

Date Collected: 08/04/11 14:35

Date Received: 08/05/11 10:30

Matrix: Solid

Analyte	Result Qualifier	RL	MDL Unit	. D	Prepared	Analyzed	Dil Fac
PCB-1016	ND	16	ug/k	(g	08/05/11 19:54	08/07/11 19:01	1
PCB-1221	ND	16	ug/ł	(g	08/05/11 19:54	08/07/11 19:01	1
PCB-1232	ND	16	ug/ł	(g	08/05/11 19:54	08/07/11 19:01	1
PCB-1242	ND	16	ug/ł	(g	08/05/11 19:54	08/07/11 19:01	1
PCB-1248	ND	16	ug/ł	(g	08/05/11 19:54	08/07/11 19:01	1
PCB-1254	ND	16	ug/ł	(g	08/05/11 19:54	08/07/11 19:01	1
PCB-1260	ND	16	ug/ł	(g	08/05/11 19:54	08/07/11 19:01	1

Surrogate	% Recovery Qualifier	Limits	Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	85	28 - 124	08/05/11 19:54	08/07/11 19:01	1
DCB Decachlorobiphenvl	94	38 - 130	08/05/11 19:54	08/07/11 19:01	1

Client Sample ID: LS-2

Lab Sample ID: 720-36756-2

Date Collected: 08/04/11 14:37 Matrix: Solid

Date Received: 08/05/11 10:30

Analyte	Result Qualifier	RL	MDL Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:15	1
PCB-1221	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:15	1
PCB-1232	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:15	1
PCB-1242	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:15	1
PCB-1248	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:15	1
PCB-1254	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:15	1
PCB-1260	24	16	ug/Kg		08/05/11 19:54	08/07/11 19:15	1

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	92		28 - 124	08/05/11 19:54	08/07/11 19:15	1
DCB Decachlorobiphenyl	87		38 - 130	08/05/11 19:54	08/07/11 19:15	1

Client Sample ID: LS-2D Lab Sample ID: 720-36756-3

Date Collected: 08/04/11 14:37

Date Received: 08/05/11 10:30

Matrix: Solid

Analyte	Result Qualifier	RL	MDL Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:29	1
PCB-1221	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:29	1
PCB-1232	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:29	1
PCB-1242	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:29	1
PCB-1248	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:29	1
PCB-1254	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:29	1
PCB-1260	ND	16	ug/Kg		08/05/11 19:54	08/07/11 19:29	1

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	40		28 - 124	08/05/11 19:54	08/07/11 19:29	1
DCB Decachlorobiphenyl	42		38 - 130	08/05/11 19:54	08/07/11 19:29	1

Client: ARCADIS U.S., Inc TestAmerica Job ID: 720-36756-1

Project/Site: Aspire Oakland

Method: 6010B - Metals (ICP)

Client Sample ID: LS-1 Lab Sample ID: 720-36756-1

Date Collected: 08/04/11 14:35 Matrix: Solid

Date Received: 08/05/11 10:30

Analyte	Result	Qualifier	RL	MDL Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	1.8		0.98	mg/Kg	9	08/05/11 16:38	08/08/11 11:40	1
Lead	2.6		0.49	mg/Kg	9	08/05/11 16:38	08/08/11 11:40	1

Client Sample ID: LS-2 Lab Sample ID: 720-36756-2

Date Collected: 08/04/11 14:37 Matrix: Solid

Date Received: 08/05/11 10:30

Analyte	Result	Qualifier RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	2.0	0.88		mg/Kg		08/05/11 16:38	08/08/11 11:46	1
Lead	4.1	0.44		mg/Kg		08/05/11 16:38	08/08/11 11:46	1

Client Sample ID: LS-2D

Lab Sample ID: 720-36756-3

Date Collected: 08/04/11 14:37 Matrix: Solid

Date Received: 08/05/11 10:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	2.1		0.88		mg/Kg		08/05/11 16:38	08/08/11 11:52	1
Lead	4.7		0.44		mg/Kg		08/05/11 16:38	08/08/11 11:52	1

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TestAmerica Job ID: 720-36756-1

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland

Method: 8260B - Volatile Organic Compounds (GC/MS)

MB MB

Lab Sample ID: MB 500-121855/4 Client Sample ID: Method Blank Prep Type: Total/NA

Matrix: Solid

Analysis Batch: 121855

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		5.0		ug/Kg			08/08/11 08:19	1

MB MB Surrogate % Recovery Analyzed Dil Fac Qualifier Limits Prepared 1,2-Dichloroethane-d4 (Surr) 69 - 120 08/08/11 08:19 82 69 - 122 Toluene-d8 (Surr) 86 08/08/11 08:19 67 - 120 08/08/11 08:19 4-Bromofluorobenzene (Surr) 85 Dibromofluoromethane 82 69 - 120 08/08/11 08:19

Lab Sample ID: LCS 500-121855/5 Client Sample ID: Lab Control Sample **Matrix: Solid** Prep Type: Total/NA

Analysis Batch: 121855

	Spike	LCS	LCS				% Rec.	
Analyte	Added	Result	Qualifier	Unit	D	% Rec	Limits	
Benzene	50.0	43.0		ug/Kg	_	86	74 - 112	

LCS LCS Surrogate % Recovery Qualifier Limits 1,2-Dichloroethane-d4 (Surr) 81 69 - 120 Toluene-d8 (Surr) 86 69 - 122 4-Bromofluorobenzene (Surr) 84 67 - 120 69 - 120 Dibromofluoromethane 84

Lab Sample ID: 720-36756-1 MS **Client Sample ID: LS-1 Matrix: Solid** Prep Type: Total/NA

Analysis Batch: 121855

	Sample	Sample	Spike	MS	MS				% Rec.	
Analyte	Result	Qualifier	Added	Result	Qualifier	Unit	D	% Rec	Limits	
Benzene	ND		50.0	34.0	F	ug/Kg		68	74 - 112	

	MS	MS	
Surrogate	% Recovery	Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	83		69 - 120
Toluene-d8 (Surr)	90		69 - 122
4-Bromofluorobenzene (Surr)	89		67 - 120
Dibromofluoromethane	86		69 - 120

Lab Sample ID: 720-36756-1 MSD Client Sample ID: LS-1 **Matrix: Solid** Prep Type: Total/NA

Analysis Batch: 121855

	Sample	Sample	Spike	MSD	MSD				% Rec.		RPD	
Analyte	Result	Qualifier	Added	Result	Qualifier	Unit	D	% Rec	Limits	RPD	Limit	
Benzene	ND		50.0	34.6	F	ug/Kg	_	69	74 - 112	2	30	

	MSD	MSD	
Surrogate	% Recovery	Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	83		69 - 120
Toluene-d8 (Surr)	89		69 - 122
4-Bromofluorobenzene (Surr)	91		67 - 120
Dibromofluoromethane	85		69 - 120

TestAmerica San Francisco

Page 10 of 21

08/09/2011

Client: ARCADIS U.S., Inc

MB MB

Project/Site: Aspire Oakland

Method: 8015B - Gasoline Range Organics - (GC)

Lab Sample ID: MB 500-121803/3

Matrix: Solid

Analysis Batch: 121803

Client Sample ID: Method Blank Prep Type: Total/NA

Analyte RL MDL Result Qualifier Unit Prepared Analyzed Dil Fac ND 20 ug/Kg 08/06/11 13:26 Gasoline Range Organics (GRO)

-C5-C12

MΒ MB Surrogate % Recovery Qualifier Limits Prepared Analyzed Dil Fac 4-Bromofluorobenzene 97 51 - 117 08/06/11 13:26 a,a,a-Trifluorotoluene 102 64 - 116 08/06/11 13:26

Lab Sample ID: LCS 500-121803/4 Client Sample ID: Lab Control Sample Prep Type: Total/NA

Matrix: Solid

Analysis Batch: 121803

Spike LCS LCS % Rec. Analyte Result Qualifier Added % Rec Limits Unit D 400 392 ug/Kg 98 70 - 130 Gasoline Range Organics (GRO)

-C5-C12

LCS LCS Surrogate % Recovery Qualifier Limits 4-Bromofluorobenzene 98 51 - 117 a,a,a-Trifluorotoluene 101 64 - 116

Lab Sample ID: LCSD 500-121803/8 Client Sample ID: Lab Control Sample Dup Prep Type: Total/NA

Matrix: Solid

Analysis Batch: 121803

LCSD LCSD RPD Spike % Rec. Analyte Added Result Qualifier Unit % Rec Limits RPD Limit 400 395 ug/Kg 99 70 - 130 30 Gasoline Range Organics (GRO)

-C5-C12

LCSD LCSD % Recovery Surrogate Qualifier Limits 4-Bromofluorobenzene 97 51 - 117 a,a,a-Trifluorotoluene 100 64 - 116

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Lab Sample ID: MB 500-121786/1-A Client Sample ID: Method Blank Matrix: Solid Prep Type: Total/NA

Analysis Batch: 121853

	MB	MB							
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		17		ug/Kg		08/05/11 19:54	08/07/11 18:18	1
PCB-1221	ND		17		ug/Kg		08/05/11 19:54	08/07/11 18:18	1
PCB-1232	ND		17		ug/Kg		08/05/11 19:54	08/07/11 18:18	1
PCB-1242	ND		17		ug/Kg		08/05/11 19:54	08/07/11 18:18	1
PCB-1248	ND		17		ug/Kg		08/05/11 19:54	08/07/11 18:18	1
PCB-1254	ND		17		ug/Kg		08/05/11 19:54	08/07/11 18:18	1
PCB-1260	ND		17		ug/Kg		08/05/11 19:54	08/07/11 18:18	1

	MB	MB				
Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	81		28 - 124	08/05/11 19:54	08/07/11 18:18	1
DCB Decachlorobiphenyl	101		38 - 130	08/05/11 19:54	08/07/11 18:18	1

TestAmerica San Francisco

TestAmerica Job ID: 720-36756-1

08/09/2011

Prep Batch: 121786

TestAmerica Job ID: 720-36756-1 Client: ARCADIS U.S., Inc

Project/Site: Aspire Oakland

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography (Continued)

Lab Sample ID: LCS 500-121786/2-A			Client Sample ID: Lab Control Sample
Matrix: Solid			Prep Type: Total/NA
Analysis Batch: 121853			Prep Batch: 121786
	Spike	LCS LCS	% Rec.

	Opino					/0 I (OO.	
Analyte	Added	Result	Qualifier Unit	D	% Rec	Limits	
PCB-1016	 167	148	ug/Kg		89	47 _ 117	
PCB-1260	167	159	ug/Kg		95	57 - 122	

	LCS	LCS	
Surrogate	% Recovery	Qualifier	Limits
Tetrachloro-m-xylene	101		28 - 124
DCB Decachlorobiphenyl	104		38 - 130

Lab Sample ID: LCSD 500-121786/3-A Client Sample ID: Lab Control Sample Dup **Prep Type: Total/NA**

Matrix: Solid Analysis Batch: 121853

Prep Batch: 121786 LCSD LCSD Spike % Rec.

Analyte	Added	Result	Qualifier	Unit	D	% Rec	Limits	RPD	Limit
PCB-1016	167	141		ug/Kg	_	85	47 - 117	4	30
PCB-1260	167	154		ug/Kg		92	57 - 122	3	30

	LCSD	LCSD	
Surrogate	% Recovery	Qualifier	Limits
Tetrachloro-m-xylene	94		28 - 124
DCB Decachlorobinhenyl	103		38 - 130

Method: 6010B - Metals (ICP)

Lab Sample ID: MB 500-121768/1-A Client Sample ID: Method Blank **Matrix: Solid** Prep Type: Total/NA

Analysis Batch: 121943 **Prep Batch: 121768**

	INID	IVID						
Analyte	Result	Qualifier	RL	MDL Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		1.0	mg/Kg		08/05/11 16:38	08/08/11 11:21	1
Lead	ND		0.50	mg/Kg		08/05/11 16:38	08/08/11 11:21	1

Lab Sample ID: LCS 500-121768/2-A Client Sample ID: Lab Control Sample **Matrix: Solid** Prep Type: Total/NA

Analysis Batch: 121943 **Prep Batch: 121768**

	Spike	LCS	LCS				% Rec.	
Analyte	Added	Result	Qualifier	Unit	D	% Rec	Limits	
Arsenic	 10.0	9.40		mg/Kg		94	80 - 120	
Lead	10.0	10.2		mg/Kg		102	80 - 120	

QC Association Summary

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland TestAmerica Job ID: 720-36756-1

GC/MS VOA

Analysis Batch: 121855

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 500-121855/4	Method Blank	Total/NA	Solid	8260B	
LCS 500-121855/5	Lab Control Sample	Total/NA	Solid	8260B	
720-36756-1	LS-1	Total/NA	Solid	8260B	
720-36756-1 MS	LS-1	Total/NA	Solid	8260B	
720-36756-1 MSD	LS-1	Total/NA	Solid	8260B	
720-36756-2	LS-2	Total/NA	Solid	8260B	
720-36756-3	LS-2D	Total/NA	Solid	8260B	

GC VOA

Analysis Batch: 121803

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 500-121803/3	Method Blank	Total/NA	Solid	8015B	
LCS 500-121803/4	Lab Control Sample	Total/NA	Solid	8015B	
720-36756-1	LS-1	Total/NA	Solid	8015B	
720-36756-2	LS-2	Total/NA	Solid	8015B	
720-36756-3	LS-2D	Total/NA	Solid	8015B	
LCSD 500-121803/8	Lab Control Sample Dup	Total/NA	Solid	8015B	

GC Semi VOA

Prep Batch: 121786

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 500-121786/1-A	Method Blank	Total/NA	Solid	3541	
LCS 500-121786/2-A	Lab Control Sample	Total/NA	Solid	3541	
LCSD 500-121786/3-A	Lab Control Sample Dup	Total/NA	Solid	3541	
720-36756-1	LS-1	Total/NA	Solid	3541	
720-36756-2	LS-2	Total/NA	Solid	3541	
720-36756-3	LS-2D	Total/NA	Solid	3541	

Analysis Batch: 121853

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 500-121786/1-A	Method Blank	Total/NA	Solid	8082A	121786
LCS 500-121786/2-A	Lab Control Sample	Total/NA	Solid	8082A	121786
LCSD 500-121786/3-A	Lab Control Sample Dup	Total/NA	Solid	8082A	121786
720-36756-1	LS-1	Total/NA	Solid	8082A	121786
720-36756-2	LS-2	Total/NA	Solid	8082A	121786
720-36756-3	LS-2D	Total/NA	Solid	8082A	121786

Metals

Prep Batch: 121768

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 500-121768/1-A	Method Blank	Total/NA	Solid	3050B	
LCS 500-121768/2-A	Lab Control Sample	Total/NA	Solid	3050B	
720-36756-1	LS-1	Total/NA	Solid	3050B	
720-36756-2	LS-2	Total/NA	Solid	3050B	
720-36756-3	LS-2D	Total/NA	Solid	3050B	

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QC Association Summary

Client: ARCADIS U.S., Inc TestAmerica Job ID: 720-36756-1

Project/Site: Aspire Oakland

Metals (Continued)

Analysis Batch: 121943

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method I	Prep Batch
MB 500-121768/1-A	Method Blank	Total/NA	Solid	6010B	121768
LCS 500-121768/2-A	Lab Control Sample	Total/NA	Solid	6010B	121768
720-36756-1	LS-1	Total/NA	Solid	6010B	121768
720-36756-2	LS-2	Total/NA	Solid	6010B	121768
720-36756-3	LS-2D	Total/NA	Solid	6010B	121768
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Lab Chronicle

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland TestAmerica Job ID: 720-36756-1

Client Sample ID: LS-1 Lab Sample ID: 720-36756-1

Date Collected: 08/04/11 14:35 Matrix: Solid

Date Received: 08/05/11 10:30

	Batch	Batch		Dilution	Batch	Prepared		
Prep Type	Type	Method	Run	Factor	Number	Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	121855	08/08/11 09:19	BDW	TAL CHI
Total/NA	Analysis	8015B		1	121803	08/06/11 14:37	WRE	TAL CHI
Total/NA	Prep	3541			121786	08/05/11 19:54	JP	TAL CHI
Total/NA	Analysis	8082A		1	121853	08/07/11 19:01	GMO	TAL CHI
Total/NA	Prep	3050B			121768	08/05/11 16:38	PJ	TAL CHI
Total/NA	Analysis	6010B		1	121943	08/08/11 11:40	TDS	TAL CHI

Client Sample ID: LS-2 Lab Sample ID: 720-36756-2

Date Collected: 08/04/11 14:37

Date Received: 08/05/11 10:30

	Batch	Batch		Dilution	Batch	Prepared		
Prep Type	Type	Method	Run	Factor	Number	Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	121855	08/08/11 10:37	BDW	TAL CHI
Total/NA	Analysis	8015B		1	121803	08/06/11 15:13	WRE	TAL CHI
Total/NA	Prep	3541			121786	08/05/11 19:54	JP	TAL CHI
Total/NA	Analysis	8082A		1	121853	08/07/11 19:15	GMO	TAL CHI
Total/NA	Prep	3050B			121768	08/05/11 16:38	PJ	TAL CHI
Total/NA	Analysis	6010B		1	121943	08/08/11 11:46	TDS	TAL CHI

Client Sample ID: LS-2D

Date Collected: 08/04/11 14:37

Lab Sample ID: 720-36756-3

Matrix: Solid

Date Received: 08/05/11 10:30

	Batch	Batch		Dilution	Batch	Prepared		
Prep Type	Type	Method	Run	Factor	Number	Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B			121855	08/08/11 11:03	BDW	TAL CHI
Total/NA	Analysis	8015B		1	121803	08/06/11 15:48	WRE	TAL CHI
Total/NA	Prep	3541			121786	08/05/11 19:54	JP	TAL CHI
Total/NA	Analysis	8082A		1	121853	08/07/11 19:29	GMO	TAL CHI
Total/NA	Prep	3050B			121768	08/05/11 16:38	PJ	TAL CHI
Total/NA	Analysis	6010B		1	121943	08/08/11 11:52	TDS	TAL CHI

Laboratory References:

TAL CHI = TestAmerica Chicago, 2417 Bond Street, University Park, IL 60484, TEL (708)534-5200

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Matrix: Solid

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Certification Summary

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland

TestAmerica Chicago TestAmerica Chicago

TestAmerica Chicago

TestAmerica Chicago

Authority Program **EPA Region Certification ID** Laboratory TestAmerica San Francisco California State Program 2496 DoD ELAP ACLASS ADE-1429 TestAmerica Chicago TestAmerica Chicago ACLASS ISO/IEC 17025 AT-1428 TestAmerica Chicago State Program 40461 Alabama TestAmerica Chicago California **NELAC** 9 01132CA TestAmerica Chicago Florida **NELAC** 4 E871072 TestAmerica Chicago Georgia Georgia EPD N/A TestAmerica Chicago Georgia State Program 4 939 TestAmerica Chicago Hawaii State Program N/A TestAmerica Chicago Illinois NELAC 100201 Indiana State Program 5 C-IL-02 TestAmerica Chicago TestAmerica Chicago Iowa State Program 82 E-10161 NELAC TestAmerica Chicago Kansas 4 TestAmerica Chicago Kentucky Kentucky UST 66 TestAmerica Chicago Kentucky State Program 90023 TestAmerica Chicago Louisiana **NELAC** 30720 TestAmerica Chicago Massachusetts State Program M-IL035 TestAmerica Chicago Mississippi State Program N/A TestAmerica Chicago North Carolina North Carolina DENR 291 6 TestAmerica Chicago Oklahoma State Program 8908 TestAmerica Chicago South Carolina State Program 4 77001 6 TestAmerica Chicago Texas **NELAC** T104704252-09-TX

Accreditation may not be offered or required for all methods and analytes reported in this package. Please contact your project manager for the laboratory's current list of certified methods and analytes.

USDA

NELAC Secondary AB

State Program

State Program

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USDA

Virginia

Wisconsin

Wyoming

TestAmerica Job ID: 720-36756-1

P330-09-00027

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Method Summary

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland

Laboratory Method **Method Description** Protocol 8260B Volatile Organic Compounds (GC/MS) SW846 TAL CHI Gasoline Range Organics - (GC) SW846 TAL CHI 8015B 8082A Polychlorinated Biphenyls (PCBs) by Gas Chromatography SW846 TAL CHI 6010B Metals (ICP) SW846 TAL CHI

Protocol References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL CHI = TestAmerica Chicago, 2417 Bond Street, University Park, IL 60484, TEL (708)534-5200

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TestAmerica Job ID: 720-36756-1

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Sample Summary

Client: ARCADIS U.S., Inc Project/Site: Aspire Oakland

Client Sample ID Matrix Lab Sample ID Collected Received 720-36756-1 LS-1 Solid 08/04/11 14:35 08/05/11 10:30 720-36756-2 LS-2 Solid 08/04/11 14:37 08/05/11 10:30 720-36756-3 LS-2D Solid 08/04/11 14:37 08/05/11 10:30

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TestAmerica Job ID: 720-36756-1

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ARCADIS Infrastructure, environment, buildings

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70-36756

CHAIN OF CUSTODY & LABORATORY

ANALYSIS REQUEST FORM

Page of

Lab Work Order#

Specify Turnaround Requirements ☐ Cooler packed with ice (√) Test Amorica Special Instructions/Comments Send Results to: 20730826 CofC AR Form 01,12,2007 ASPICE SCHOOL Pos Golovbou Emeryville CA PHEED DON. golouboure 5 2000 Powell & to いく Arcadio - Ron G S . Į Sample ID 7 0 Laboratory information and Receipt 844111437 大公司 1000 28 AIN 1632 S CO Condition/Cooler Temp: Sample Receipt Cooler Custody Seal (イ) □ Intact Collection Time 5 Distribution: readis - WS. Com Comp □ Not intact Type (イ) 9550 G G 501 WHITE - Laboratory returns with results

437952306739 Š 5 **Matrix** Cateffine & Signature 3 # of Containers Preservative K Container Information Filtered (5) 1 Relinquished By Statoven × 7 **PARAMETER ANALYSIS & METHOD** f. Benzere ☐ Special QA/QC Instructions(</): Dote/Time: Firm/Courier Frinted Name: Fed Ex Arbill Firm/Courier Relinquished By Bax holoson Benzen by ron. go lod bow @ 510 501-1784 CE S S 32d 251175 17001 Matrix Key: SO - Soil W - Water T - Tissue A. H.SO. B. HÖL C. HNO. D. NaOH E. Norra REMARKS G, Other, H. Other: Preservation Key: 5 PINK - Retained by ARCADIS SE - Sediment SL - Sludge A - Air ð 8280 A Laboratory Received By 9208 뒿 3. 250 ml Plastic 4. 500 ml Plastic 5. Encore 6. 2 oz. Glass 7. 4 oz. Glass 8. 8 oz. Glass 40 ml Vial
 1 LAmber Container Information Key: arcads-45 NL - NAPL/Oil SW - Sample Wipe Other: _____

Login Sample Receipt Checklist

Client: ARCADIS U.S., Inc Job Number: 720-36756-1

Login Number: 36756 List Source: TestAmerica San Francisco

List Number: 1 Creator: Mullen, Joan

Question	Answer	Comment
		Comment
Radioactivity either was not measured or, if measured, is at or below background	N/A	
The cooler's custody seal, if present, is intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	True	

TestAmerica San Francisco

Login Sample Receipt Checklist

Client: ARCADIS U.S., Inc Job Number: 720-36756-1

List Source: TestAmerica Chicago Login Number: 36756 List Creation: 08/05/11 12:38 PM List Number: 1

Creator: Lunt, Jeff T

Question	Answer	Comment
Radioactivity either was not measured or, if measured, is at or below background	True	
The cooler's custody seal, if present, is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	True	

Attachment 4

Waste Disposal Information

PCB-Affected TSCA Soil Disposal Summary Waste Management Kettleman Hills Landfill Aspire School Oakland, California

Date Received	Manifest #	Net Tons
11/19/2009	006299826	21.66
11/19/2009	006299827	22.66
11/19/2009	006299829	24.88
11/19/2009	006299830	29.59
11/19/2009	006299831	23.51
11/19/2009	006299832	23.99
11/20/2009	006299828	25.77
11/20/2009	006299833	15.08
11/20/2009	006299834	18.84
12/29/2009	005417898	21.10
12/29/2009	005417899	24.39
12/29/2009	005417900	22.94
12/29/2009	005417901	23.07
12/29/2009	005417927	25.50
12/29/2009	005417928	25.52
12/29/2009	005417929	24.71
12/29/2009	005417930	28.65
12/29/2009	005417931	24.35
12/29/2009	005417932	24.76
12/29/2009	005417933	22.12
12/10/2009	006299813	22.68
12/10/2009	006299814	23.64
12/10/2009	006299815	24.20
12/10/2009	006299816	29.31
12/10/2009	006299817	22.19
12/11/2009	006299812	26.63
12/30/2009	005417902	26.38
12/30/2009	005417904	24.76
12/30/2009	005417905	22.79
12/30/2009	005417916	24.42
12/30/2009	005417917	24.57
12/30/2009	005417918	25.54
12/30/2009	005417919	23.30
12/30/2009	005417920	27.75
12/30/2009	005417921	28.04
12/30/2009	005417922	23.63
12/30/2009	005417923	24.63
12/30/2009	005417924	25.31
12/30/2009	005417925	23.31

PCB-Affected TSCA Soil Disposal Summary Waste Management Kettleman Hills Landfill Aspire School Oakland, California

12/30/2009	005447000	
12/30/2009	005417926	22.64
3/25/2010	005417523	24.19
3/25/2010	005417529	26.8
3/25/2010	005417530	23.42
3/26/2010	005417531	22.66
3/26/2010	005417532	24.15
3/26/2010	005417528	23.16
3/26/2010	005417527	25.68
3/26/2010	005417526	26.06
3/26/2010	005417525	23.67
3/26/2010	005417524	22.35
8/5/2010	005417521	22.57
8/5/2010	005417522	24.41
8/5/2010	005417534	22.92
Total Tons PCB-A	ffected Soil	1280.85

Kettleman Hills Landfill Summary (Non-RCRA and TSCA Soil) and TSCA Manifests



Avia Bate Wanifest	i Profile -	I ROVENSE	R/CV Taire	ROVINE	Net Tons Gen. Name 2
2.6		Weight		Weight	
2/9/2010 005418601JJK	CA579061	87020	30900	56120	28.06 ASPIRE PUBLIC SCHOOLS
005418602JJK	CA579061	87700	30560	57140	28.57 ASPIRE PUBLIC SCHOOLS
005418603JJK	CA579061	78660	28820	49840	24.92 ASPIRE PUBLIC SCHOOLS
005418604JJK	CA579061	80080	30560	49520	24.76 ASPIRE PUBLIC SCHOOLS
005418605JJK	CA579061	76460	29660	46800	23.4 ASPIRE PUBLIC SCHOOLS
005418606JJK	CA579061	81580	31600	49980	24.99 ASPIRE PUBLIC SCHOOLS
005418608JJK	CA579061	81320	33420	47900	23.95 ASPIRE PUBLIC SCHOOLS
005418609JJK	CA579061	78460	31720	46740	23.37 ASPIRE PUBLIC SCHOOLS
005418622JJK	CA579061	79800	30540	49260	24.63 ASPIRE PUBLIC SCHOOLS
005418623JJK	CA579061	77580	33100	44480	22.24 ASPIRE PUBLIC SCHOOLS
005418624JJK	CA579061	74900	32900	42000	21 ASPIRE PUBLIC SCHOOLS
TOTAL				539780	269.89
COUNT 11					
2/10/2010 005418572JJK	CA579061	88200	33760	54440	27.22 ASPIRE PUBLIC SCHOOLS
005418573JJK	CA579061	79120	28860	50260	25.13 ASPIRE PUBLIC SCHOOLS
005418574JJK	CA579061	80340	33700	46640	23.32 ASPIRE PUBLIC SCHOOLS
005418575JJK	CA579061	75740	34140	41600	20.8 ASPIRE PUBLIC SCHOOLS
005418576JJK	CA579061	80980	33280	47700	23.85 ASPIRE PUBLIC SCHOOLS
005418577JJK	CA579061	78120	29760	48360	24.18 ASPIRE PUBLIC SCHOOLS
005418578JJK	CA579061	80160	31620	48540	24.27 ASPIRE PUBLIC SCHOOLS
005418579JJK	CA579061	81000	31040	49960	24.98 ASPIRE PUBLIC SCHOOLS
005418580JJK		81820	30580	51240	25.62 ASPIRE PUBLIC SCHOOLS
005418581JJK	CA579061	79680	29280	50400	25.2 ASPIRE PUBLIC SCHOOLS
005418582JJK	CA579061	78380	30380	48000	24 ASPIRE PUBLIC SCHOOLS
005418583JJK	CA579061	81800	30500	51300	25.65 ASPIRE PUBLIC SCHOOLS
005418584JJK	CA579061	78700	30020	48680	24.34 ASPIRE PUBLIC SCHOOLS
005418585JJK		76240	32360	43880	21.94 ASPIRE PUBLIC SCHOOLS
005418607JJK	CA579061	87280	32340	54940	27.47 ASPIRE PUBLIC SCHOOLS
005418610JJK		76340	32780	43560	21.78 ASPIRE PUBLIC SCHOOLS
005418621JJK	CA579061	96660	32700	63960	31.98 ASPIRE PUBLIC SCHOOLS
TOTAL				843460	421.73
COUNT 17					

2/11/2010 005418561JJK	CA579061	80260	28860	51400	25.7 ASPIRE PUBLIC SCHO	OOLS
005418586JJK	CA579061	80100	32620	47480	23.74 ASPIRE PUBLIC SCHO	OOLS
005418587JJK	CA579061	82800	30600	52200	26.1 ASPIRE PUBLIC SCHO	OOLS
005418588JJK	CA579061	79840	30400	49440	24.72 ASPIRE PUBLIC SCHO	OOLS
005418589JJK	CA579061	75360	32160	43200	21.6 ASPIRE PUBLIC SCHO	OOLS
005418590JJK	CA579061	80580	32200	48380	24.19 ASPIRE PUBLIC SCHO	OOLS
005418591JJK	CA579061	78920	30100	48820	24.41 ASPIRE PUBLIC SCHO	OOLS
TOTAL				340920	170.46	
COUNT	7					
Total Documents:					OFFICE	
TOTAL			•	1724160	862.08	
COUNT 3	5					
######## 54:11:00	כ				PAGE 2	
*** END OF REPO	RT * * *					



Arr.Date Manif	est Profile	RCV Gross Weight	RCV Tare • Weight	RCV Net. Weight	Net Tons Gen. Name
3/25/2010 0054175	23JJK CA578935	78100	29720	48380	24.19 ASPIRE PUBLIC SCHOOLS
00541752	29JJK CA578935	85960	32360	53600	26.8 ASPIRE PUBLIC SCHOOLS
0054175	30JJK CA578935	79600	32760	46840	23.42 ASPIRE PUBLIC SCHOOLS
TOTAL				148820	74.41
COUNT	3				
3/26/2010 0054175	24JJK CA578935	79260	34560	44700	22.35 ASPIRE PUBLIC SCHOOLS
00541752	25JJK CA578935	80300	32960	47340	23.67 ASPIRE PUBLIC SCHOOLS
00541752	26JJK CA578935	85700	33580	52120	26.06 ASPIRE PUBLIC SCHOOLS
00541752	27JJK CA578935	84120	32760	51360	25.68 ASPIRE PUBLIC SCHOOLS
00541752	28JJK CA578935	78840	32520	46320	23.16 ASPIRE PUBLIC SCHOOLS
0054175	31JJK CA578935	78860	30560	48300	24.15 ASPIRE PUBLIC SCHOOLS
0054175	32JJK CA578935	77740	32420	45320	22.66 ASPIRE PUBLIC SCHOOLS
TOTAL				335460	167.73
COUNT	7				
Total Documer	nts:				
TOTAL				484280	242.14
COUNT	10				
*** END OFRE	PO RT * * *				



LAMADAGE LE MANIGALE	s - Erenia :				Net Tons Gen. Name
THE MAINTEN			Weight:	Weight	Rectalls Gell, Mallie
3/25/2010 005417501JJk	CA579061	87400	32740	54660	27.33 ASPIRE PUBLIC SCHOOLS
005417502JJk		80540	30200	50340	25.17 ASPIRE PUBLIC SCHOOLS
005417503JJk		77460	32080	45380	22.69 ASPIRE PUBLIC SCHOOLS
005417504JJk		84600	29520	55080	27.54 ASPIRE PUBLIC SCHOOLS
005417505JJk	CA579061	78300	30440	47860	23.93 ASPIRE PUBLIC SCHOOLS
005417506JJk	CA579061	76720	31780	44940	22.47 ASPIRE PUBLIC SCHOOLS
005417507JJK	CA579061	79820	30180	49640	24.82 ASPIRE PUBLIC SCHOOLS
005417508JJk	CA579061	78320	29980	48340	24.17 ASPIRE PUBLIC SCHOOLS
005417509JJK	CA579061	77420	31860	45560	22.78 ASPIRE PUBLIC SCHOOLS
005417510JJK	CA579061	78320	33040	45280	22.64 ASPIRE PUBLIC SCHOOLS
005417511JJK	CA579061	73820	29440	44380	22.19 ASPIRE PUBLIC SCHOOLS
005417512JJk	CA579061	81460	31780	49680	24.84 ASPIRE PUBLIC SCHOOLS
TOTAL				581140	290.57
COUNT 1:	2				
4/5/2010 005417556JJK	CA579061	77220	30420	46800	23.4 ASPIRE PUBLIC SCHOOLS
005417557JJK		79360	32500	46860	23.43 ASPIRE PUBLIC SCHOOLS
005417558JJK		77320	33140	44180	22.09 ASPIRE PUBLIC SCHOOLS
005417559JJK		80660	30260	50400	25.2 ASPIRE PUBLIC SCHOOLS
005417560JJK		76840	32240	44600	22.3 ASPIRE PUBLIC SCHOOLS
005417561JJK		86900	28700	58200	29.1 ASPIRE PUBLIC SCHOOLS
005417562JJK		86120	30000	56120	28.06 ASPIRE PUBLIC SCHOOLS
005417563JJK		88580	32020	56560	28.28 ASPIRE PUBLIC SCHOOLS
005417564JJK		78640	31760	46880	23.44 ASPIRE PUBLIC SCHOOLS
005417565JJK		77900	30180	47720	23.86 ASPIRE PUBLIC SCHOOLS
005417566JJK		79660	30600	49060	24.53 ASPIRE PUBLIC SCHOOLS
005417567JJK		76460	29520	46940	23.47 ASPIRE PUBLIC SCHOOLS
005417568JJK		72420	32820	39600	19.8 ASPIRE PUBLIC SCHOOLS
005417569JJK		79920	31740	48180	24.09 ASPIRE PUBLIC SCHOOLS
005417572JJK		81420	34560	46860	23.43 ASPIRE PUBLIC SCHOOLS
005417573JJK	CA579061	82620	31000	51620	25.81 ASPIRE PUBLIC SCHOOLS
TOTAL				780580	390.29
COUNT 16	3				

	7						
4/6/2010	005417552JJK	CA579061	74900	27820	47080	23.54 ASPIRE PUBLIC SO	CHOOLS
	005417553JJK	CA579061	85600	33500	52100	26.05 ASPIRE PUBLIC SC	CHOOLS
	005417554JJK	CA579061	78960	32600	46360	23.18 ASPIRE PUBLIC SC	CHOOLS
	005417555JJK	CA579061	79340	31240	48100	24.05 ASPIRE PUBLIC SC	CHOOLS
	005417570JJK	CA579061	80520	30560	49960	24.98 ASPIRE PUBLIC SO	CHOOLS
	005417571JJK	CA579061	77000	33340	43660	21.83 ASPIRE PUBLIC SC	CHOOLS
	005417575JJK	CA579061	73340	33480	39860	19.93 ASPIRE PUBLIC SO	CHOOLS
TOTAL					327120	163.56	
COUNT	7						
Total	Documents:						
TOTAL					1688840	844.42	
COUNT	35						
#########	42:30:00					PAGE 2	
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Arr.Date	Manifest	Profile	RCV Gross Weight	RCV Tare Weight	RCV Net Weight	Net Tons:	Gen. Na ne
8/5/2010	005417521JJK	CA578935	75720	30580	45140	22.57 ASPIRE PL	JBLIC SCHOOLS
	005417522JJK	CA578935	76900	28080	48820	24.41 ASPIRE PU	JBLIC SCHOOLS
	005417534JJK	CA578935	75420	29580	45840	22.92 ASPIRE PL	JBLIC SCHOOLS
TOTAL					139800	69.9	
COUNT	3	}					
Total	Documents:						
TOTAL					139800	69.9	
COUNT	3	}					
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				TOTAL TARREST		
Arr.Date Manif	est Polite	RCV Gross - Weight	RCV Tare Weight	RCV Nei Weight	Net Tons Gen. Name	
0///0040 NAE/47E	AG LIV CAEZODOS	миципы этимотка и ченикальная произвольной истанов.	interest victorial interest control victorial infiliation. The state of the state o		22 47 ACRIDE DURI IO COLLOOLO	
8/4/2010 0054175		76320	29980	46340	23.17 ASPIRE PUBLIC SCHOOLS	
	47JJK CA579061	79840	28620	51220	25.61 ASPIRE PUBLIC SCHOOLS)
TOTAL	0			97560	48.78	
COUNT	2					
8/6/2010 0054175		80060	32560	47500	23.75 ASPIRE PUBLIC SCHOOLS	
	48JJK CA579061	86180	31820	54360	27.18 ASPIRE PUBLIC SCHOOLS	3
	51JJK CA579061	77420	32260	45160	22.58 ASPIRE PUBLIC SCHOOLS	3
TOTAL				147020	73.51	
COUNT	3					
8/9/2010 0054175	14JJK CA579061	81020	32400	48620	24.31 ASPIRE PUBLIC SCHOOLS	3
0054175	15JJK CA579061	82860	31840	51020	25.51 ASPIRE PUBLIC SCHOOLS	3
0054175	16JJK CA579061	79400	31420	47980	23.99 ASPIRE PUBLIC SCHOOLS	3
TOTAL				147620	73.81	
COUNT	3					
8/10/2010 0054175	17JJK CA579061	87620	32600	55020	27 51 ASPIRE PUBLIC SCHOOLS	3
		0,000	31000			,
	3			130400	10.20	
	•					
	ito.			E 40660	074.00	
	11			54Z66U	211.33	
TOTAL COUNT 8/10/2010 0054175 0054175	3 17JJK CA579061 19JJK CA579061 20JJK CA579061 3 nts:	, , , , ,	31420 32600 32440 31860		23.99 ASPIRE PUBLIC SCHOOLS	S S



WASTE MANAGEMENT						
Arr.Date Manifest	Profile	RCV Gross Weight	RCV Tare Weight	RCV Net Weight	Net Tons Gen	Name
11/19/2009 006299826JJK	CA578935	75280	31960	43320	21.66 ASPIRE PUBLIC	SCHOOLS
006299827JJK	CA578935	77360	32040	45320	22.66 ASPIRE PUBLIC	SCHOOLS
006299829JJK	CA578935	80360	30600	49760	24.88 ASPIRE PUBLIC	SCHOOLS
006299830JJK	CA578935	91200	32020	59180	29.59 ASPIRE PUBLIC	SCHOOLS
006299831JJK	CA578935	76560	29540	47020	23.51 ASPIRE PUBLIC	SCHOOLS
006299832JJK	CA578935	80580	32600	47980	23.99 ASPIRE PUBLIC	SCHOOLS
TOTAL				292580	146.29	
COUNT 6						
11/20/2009 006299828JJK		81700	30160	51540	25.77 ASPIRE PUBLIC	SCHOOLS
006299833JJK	CA578935	64220	34060	30160	15.08 ASPIRE PUBLIC	SCHOOLS
006299834JJK	CA578935	71340	33660	37680	18.84 ASPIRE PUBLIC	SCHOOLS
TOTAL				119380	59.69	
COUNT 3						
12/10/2009 006299813JJK	CA578935	80200	34840	45360	22.68 ASPIRE PUBLIC	SCHOOLS
006299814JJK		79820	32540	47280	23.64 ASPIRE PUBLIC	SCHOOLS
006299815JJK		78960	30560	48400	24.2 ASPIRE PUBLIC	SCHOOLS
006299816JJK		91000	32380	58620	29.31 ASPIRE PUBLIC	SCHOOLS
006299817JJK	CA578935	77000	32620	44380	22.19 ASPIRE PUBLIC	SCHOOLS
TOTAL				244040	122.02	
COUNT 5						
12/11/2009 006299812JJK	CA578935	84060	30800	53260	26.63 ASPIRE PUBLIC	SCHOOLS
TOTAL				53260	26.63	
COUNT 1						
12/29/2009 005417898JJK		74300	32100	42200	21.1 ASPIRE PUBLIC	SCHOOLS
005417899JJK		79340	30560	48780	24.39 ASPIRE PUBLIC	SCHOOLS
005417900JJK		77360	31480	45880	22.94 ASPIRE PUBLIC	\$CHOOLS
005417901JJK		80280	34140	46140	23.07 ASPIRE PUBLIC	\$CHOOLS
005417927JJK		85520	34520	51000	25.5 ASPIRE PUBLIC	SCHOOLS
005417928JJK		84100	33060	51040	25.52 ASPIRE PUBLIC	SCHOOLS
005417929JJK		81640	32220	49420	24.71 ASPIRE PUBLIC	SCHOOLS
005417930JJK		89760	32460	57300	28.65 ASPIRE PUBLIC	SCHOOLS
005417931JJK	CA578935	79700	31000	48700	24.35 ASPIRE PUBLIC	SCHOOLS

				22722	40500	0.4.70	A ODIDE DUDI IO	2011001.0
	005417932JJK		80220	30700	49520		ASPIRE PUBLIC	5
	005417933JJK	CA578935	76420	32180	44240		ASPIRE PUBLIC	SCHOOLS
TOTAL					534220	267.11		
COUNT	11							
12/30/2009	005417902JJK	CA578935	80340	27580	52760	26.38	ASPIRE PUBLIC S	SCHOOLS
	005417904JJK	CA578935	80240	30720	49520	24.76	ASPIRE PUBLIC S	SCHOOLS
	005417905JJK	CA578935	76440	30860	45580	22.79	ASPIRE PUBLIC :	SCHOOLS
	005417916JJK	CA578935	82880	34040	48840	24.42	ASPIRE PUBLIC	SCHOOLS
##########	41:16:00						PAGE 2	
Arr.Date	Manifest	Profile	RCV Gross	RCV Tare	RCV Net	Net Tons	Gen. Name	
			Weight	Weight	Weight			
12/30/2009	005417917JJK	CA578935	83660	34520	49140	24.57	ASPIRE PUBLIC	SCHOOLS
	005417918JJK	CA578935	84260	33180	51080	25.54	ASPIRE PUBLIC	SCHOOLS
	005417919JJK	CA578935	78020	31420	46600	23.3	ASPIRE PUBLIC	SCHOOLS
	005417920JJK	CA578935	88000	32500	55500	27.75	ASPIRE PUBLIC	SCHOOLS
	005417921JJK		88380	32300	56080		ASPIRE PUBLIC	
	005417922JJK		79040	31780	47260	— -	ASPIRE PUBLIC	7
	005417923JJK		79840	30580	49260		ASPIRE PUBLIC	I
	005417924JJK		80660	30040	50620		ASPIRE PUBLIC	F
	005417925JJK		78840	32220	46620	— - · - ·	ASPIRE PUBLIC	F
	005417926JJK		78260	32980	45280		ASPIRE PUBLIC	1
TOTAL	0004173203310	OA070333	70200	32300	694140			GOLIOOLO
COUNT	14				094140	347.07		
Total	Documents:							
TOTAL	Documents.				1027600	060.04		
	40				1937620	968.81		
COUNT	40							
~ * * E N D	OF REPO	RT ***						

UNIFORM HAZARDOUS WASTE MANIFEST CAC 06 26 4 7 7 7 7 8 1 2. Page 1 of 3. Emergency Response Phone WASTE MANIFEST CAC 06 26 4 7 7 7 8 1 4 4 5 3 5 2 - 12 1 2 0 0 6 2 9 9 8 2 5. Generator's Name and Mailing Address Aspire Public Schools 1001 22nd Avenue, Suite 100 000 0000 0000 0000 0000 0000 0000	
Happire Mobile Schools 1009 66th Avenue	6 JJK
1001 22nd Avenue Suiteloo	
1 COLECTION INVALIGE DOLLAROO	
make a at author	•
© Transporter 1 Company Name	***************************************
7. Transporter 2 Company Name V. CAR OCO 14	1.207 4
7. Transporter 2 Company Name U.S. EPA ID Number	2001
8. Designated Facility Name and Site Address U.S. EPAID Number Kettleman Hills (waste management)	
35251 Old Skyline Road CA FOOS 646117	5p
Facility's Phone: Kellleman City, CA 93239 (559)386-6200 (CATOOO)	
9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11 Total 13 Heit	•
No. Type Quantity Wt./Vol.	Waste Codes
+ Representally Hazardore Sobolence, Solid, Holy Ber 7 26T (Rotychlamiched Biomenyls) (ScillingscholwithFCB) 2 RQ, Fenviron mentally an ended withFCB) X Solid, N.O. & Chalychlorivated bip haryls , 9, 00 1 DT 18 y 261	
(Polychlamickel Bionemyls) (Soit Engage V. U.PCB)	
2 RQ (FAVIRON- estatu hazardons substancis)	
X Solid, N.O. S. Cpolychlocivifed bipheryls , 9, 00 DT 18 y 261	
NA 2077, 111 001 DT 18 /	
]3.	
4.	
14. Special Handling Instructions and Additional Information	
wm Profile: CA 578935 19650 Kgs. OSD:11/19/09	ł
9 E 2 4 0 2 4 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consistence are fully and except the decisibed above by the contents of this consistence are fully and except the decisibed above by the contents of the contents of this consistence are fully and except the decisibed above by the contents of the contents of this consistence are fully and except the decisibed above by the contents of the contents	
marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national dovernmental regulations (ferror shipping name, and are	sitted, packaged, am the Primary
Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.	
Generator's/Offeror's Printed/Typed Name Signature / Month	nth Day Year
Ann V. BAUER Chan VBa nec 1	11809
16. International Shipments Export from U.S. Port of entry/exit:	······································
Transporter signature (for exports only): Date leaving U.S.:	The state of the s
17. Transporter Acknowledgment of Receipt of Materials	***************************************
ransporter 1 Printed/Typed Name Starrature	
(ransporter 1 Printed/Typed Name SERGLO F GIRRIA Signrature LIVER SIGNRA SIGNRA LIVER SIGNRA LI	1 18 09
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Transporter 1 Printed/Typed Name Signature Signature Mont Mont Manifest Reference Number: U.S. EPA ID Number Acility's Phone: Sc. Signature of Alternate Facility (or Generator) Mont Mont Mont Mont Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)	th Day Year
Transporter 1 Printed/Typed Name Signature Signature Mont Signature Mont Signature Mont Signature Mont Signature Mont Mont Residue Partial Rejection Manifest Reference Number: U.S. EPA ID Number acility's Phone: Signature of Alternate Facility (or Generator) Mont Mont	th Day Year
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Transporter 1 Printed/Typed Name Storature Mont	th Day Year Full Rejection

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,,, yk	WEIGHT (LB)	TIME	DATE	ye. 9 1 1967 °	COMMODITY: HAZ DEPUTY WEI		WE	L WASTE MANAGEMENT, INC. EGHMASTER weighed at 5251 Old Skyline Road Kettleman City, CA
GRÖSS:		Wilder Tea	Mes _{ty}	5. of		· .	NO:	149431
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YARDAGE:				and the second	See f		Code, administered by	of the California Business & Professio the Division of Measurement Standard of Food and Agriculture.
GENERATOR		ANIFEST	19(1)k	PROFILE	7005		delignación con describó de especial describó de especial de especial de especial de especial de especial de e	
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Marie Carlot

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ADDRESS OF THE PERSON	N N	NASTE MANIFEST	CAC	:0020	+7728	2. Page 1 of 3. En	nergency Respons		100	t Tracking N 629	lumber 9827	7 JJ	JK_
	5. Ge	5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address)											
	Oakland, CA giftook (510) 434-5100 oakland CA												
	€ Tra	ransporter 1 Company Nam	пе	LING				American Providence of the const	U.S. EPAID		DILÉS	<u> </u>	7
		ransporter 2 Company Nam		7					U.S. EPA ID I				
	8. De	esignated Facility Name an Kettiman 35251 old 25451 old	d Site Address	CWASTE	Managen	rent)			U.S. EPA ID I	Number	A STATE OF THE PROPERTY OF THE	Territoria de la companya del companya del companya de la companya	
	Facili	35251 old Reafterna lity's Phone:	निर्देशी	12 RODA CA, 932	39 (554	D384-6	200			-	3046 2064		()
	9a. HM	9b. U.S. DOT Description and Packing Group (if a		per Shipping Name, Ha	azard Class, ID Number,	,	10. Contai No.	niners Type	11. Total Quantity	12. Unit Wt./Vol.	13. W	/aste Codes	
TOP -		Potychiorin			as Saugiane Le. I mooded	Cane with	カンス				261	-	
GENERATOR	The state of	,		•		4P 1		-			261		roomby and endinged to
5	X	2.RQ, ENVIR SolideN. 0 9,UN30	Solpol	ychlorin	inted began	heryly);	001	DT	018	171	1381	minglishers influencing	3-1-18-18-23-1-19-18-27-18-18-18-18-18-18-18-18-18-18-18-18-18-
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DESTRUCTION OF THE PROPERTY.		4.	Works and the second se	No. of the state o	All The state of t) lightly control		
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Form Approved. OMB No. 2050-0039 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 4. Manifest Tracking Number UNIFORM HAZARDOUS 1. Generator ID Number 2. Page 1 of 3. Emergency Response Phone 415-552-1818 006299828 WASTE MANIFEST Generator's Name and Mailing Address
ASPINE TUBLIC SCHOOLS
LODI Zand Avenue Switc 100
OGKLAND, CA. A44.06 (510)4 1009 With Avenue oakland, CA (510)434-5100 Generator's Phone: U.S. EPA ID Number 6. Fransporter 1 Company Name CAR000143875 U.S. EPA ID Numbe 7. Transporter 2 Company Name 8. Designated Facility Name and Site Address
Kettleman ttills (waste management)
35251 Old Skyling Lays (CE U.S. EPA ID Number 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 11. Total 12. Unit 13. Waste Codes 9a. Wt /Vol and Packing Group (if any)) Quantity Туре HM GENERATOR Ra, Epurencestally hazardons substances, solid, N.O. 2, Croly Morina he briphen yls), 9 012 PT 0/S DAte 11-18-0923379 Kgs. 14. Special Handling Instructions and Additional Information WM Profile: CA 578935 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Year Generator's/Offeror's Printed/Typed Name International Shipments Import to U.S. Export from U.S. Port of entry/exit: Date leaving U.S.: Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Month Day Year Signature 109 INTO CANAGE Transporter 2 Printed/Typed Name 18. Discrepancy Full Rejection Partial Rejection 18a. Discrepancy Indication Space Type Quantity Residue Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) Facility's Phone: Year Month Day 18c. Signature of Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 20. Designated Facility Owner or Operator: Certification of receipt of bazardous materials covered by the manifest except as noted in Item 18a Day Printed/Typed Name Signature EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete

DESIGNATED FACILITY

	WEIGHT (LB) * *	TIME	<u>DATE</u>	COMMODITY: HAZARDOUS WASTE DEPUTY WEIGHMASTER	CHEMICAL WASTE MANAGEMENT, INC WEIGHMASTER weighed at 35251 Old Skyline Road Kettleman City, CA
GROŠŠ:	e de Maria	Marger H alignic fage		1 Adding	NO:149552
TARE:				MALL 1	WEIGHMASTER CERTIFICATE
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YARDAGE:	f of	11836		9 51540	\$12700) of Division 5 of the California Business & Professions Code, administered by the Division of Measurement Standards California Department of Food and Agriculture
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	ſ	UNIFORM HAZARDOUS 1. Generator ID Number WASTE MANIFEST CAC DO 20 4 3 8 2 9 98 2 9 5 Generator's Name and Mailing Address Generator's Site Address (if different than mailing address)	JJK							
	To desire a particular	5. Generator's Name and Mailing Address ASPITE PUBLIC SCHOOLS DOLL SCH								
		Carland, CA. author (510) 434-5100 Carland, CA.								
	1	6 Transporter 1 Company Name U.S. EPA ID Number								
	1000	7. Transporter 2 Company Name U.S. EPA ID Number	3975							
		8. Designated Facility Name and Site Address U.S. EPA ID Number								
	8. Designated Facility Name and Site Address Ecttleman Hills (waste Management) 35751 Old Styline Road Fettleman City. CA. 93239 (559) 3012-12200 CATOOGEYE! CATOOGEYE!									
		Facilitys Phone: (559) 304-6200 (470006	4611							
		9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, HM and Packing Group (if any)) No. Type Quantity Wt./Vol.	ste Codes							
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		Exporter, I certify that the contents of this consignment conform to the terms of the attached EPAAcknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.	the Filmary							
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DESIGNATED FACILITY										
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IGNA	19.	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
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		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
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EPA	For	A Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY OF DESTINATION STATE OF	REGURES							

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COMMODITY: HAZARDOUS WASTE WEIGHT (LB) TIME DATE DEPUTY WEIGHMASTER GROSS: NO: WEIGHMASTER CERTIFICATE This is to certify that the following described commodity was weighed, measured, or counted by a WEIGHMASTER, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by CHAPTER 7 (commencing with §12700) of Division 5 of the California Business & Professions Code, administered by the Division of Measurement Standards of California Department of Food and Agriculture. TARE: NET: YARDAGE: PROFILE MANIFEST GENERATOR RECEIPT# BIN# TRAILER LICENSE NO. TRACTOR LICENSE #

CHEMICAL WASTE MANAGEMENT, INC WEIGHMASTER weighed at 35251 Old Skyline Road Kettleman City, CA

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5. Generator's Name and Mailing Address ASPINE FUNDING SCHOOLS LOOL ZZNA AND SUNE LOO OAKLAND, CA. 44400 (510) 434.5100 Generator's Phone:	arland,	CA.					1
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35251 oldskyline Road Ketternan City CA. 93239				170	0069	4611	7
Facility's Phone: (599) 384 - 6200			1		1		
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WEIGHT (LB) TIME DATE GROSS:	COMMODITY: HAZARDOUS WASTE DEPUTY WEIGHMASTER	CHEMICAL WASTE MANAGEMENT, INC WEIGHMASTER weighed at 35251 Old Skyline Road Kettleman City, CA
TARE:	1 /607	WEIGHMASTER CERTIFICATE
NET: 1.41(b) 1.1.19.29 person 1.1.1.19.	Jan 1919	This is to certify that the following described commodity was weighed, measured, or counted by a WEIGHMASTER, whos is recognized authority of accuracy, as prescribed by CHAPTER 7 (commencing with §12700) of Division 5 of the California Business & Profession Code, administered by the Division of Measurement Standard
YARDAGE:		California Department of Food and Agriculture.
RACTOR LICENSE # TRAILER LICENSE NO. BIN #	RECEIPT# 7	John Charles

Carried States

Form Approved. OMB No. 2050-0039 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 4. Manifest Tracking Number 2. Page 1 of 3. Emergency Response Phone UNIFORM HAZARDOUS 1. Generator ID Number 006299833 UIF 552 1818 006 Generator's Site Address (if different than mailing address) **WASTE MANIFEST** 5. Generator's Name and Mailing Address

1. Spire Public Schools

1. Coloratory August

1. Generator's Phone: 1009 Letth Avenue carrand CA (510) 434-5100 YCA 200143873 U.S. EPAID Number 6. Transporter 1 Company Name U.S. EPA ID Number 8. Designated Facility Name and Site Address

FEHLEMAN HILLS (WASTE MANUSEMENT)

35251 old Biss Skyline Road

FeHLEMAN CHY, CA. 93239 (559) 386.6200

Earlity's Phone: 10. Containers 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 13. Waste Codes Quantity Type and Packing Group (if any)) HM BALL PER ENVIRONMENTALLY HERSHAMS SWESTANCE, SOLIN, N. BRK entroporated Siprientis) as alia improvativity GENERATOR 2.RO, Esvicornes tally hazardous substances golid, N.O.A., Coolychlociantel topheryll), 9 NA 3077, 111 012 001 015 11-18-09 14. Special Handling Instructions and Additional Information 13690 kgs. VM Profile: CA578935 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Day Year Signature Generator's/Offeror's Printed/Typed Name 16. International Shipments __ Export from U.S. Port of entry/exit: Import to U.S. Date leaving U.S.: Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Materials Signature Transporter 1 Printed/Typed Name 67 12-12-6119 Transporter 2 Printed/Typed Name 18. Discrepancy ___ Full Rejection Partial Rejection Residue 18a. Discrepancy Indication Space Type Quantity Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) Year Facility's Phone: Month Day 18c. Signature of Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) Ardous materials covered by the manifest except as noted in Item 18a 20. Designated Facility Owner or Operator: Certification of receipt of ha Signature Printed/Typed Name DESTINATION STATE (IF REQUIRE EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

WING WEEK		
E 22	COMMODITY: HAZARDOUS WASTE	CHEMICAL WASTE MANAGEMENT, INC
°♥ '	DEPUTY WEIGHMASTER	WEIGHMASTER weighed at 35251 Old Skyline Road
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TAILE.	<u>/_ // / </u>	WEIGHMASTER CERTIFICATE
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	LIV TALO	§12700) of Division 5 of the California Business & Professions Code, administered by the Division of Measurement Standards of
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	1	UNIFORM HAZARDOUS 1. Generator ID Number WASTE MANIFEST CAC 00ZU4748	2. Page 1 of	415	-552	-1819		629	umber 983	4 JJ	IK
		5. Generator's Name and Mailing Address ASINE PUBLIC SCHOOLS LOO ZZANG AVENUE SWIFE VOD GENERATOR'S Phone: 6. Transporter 1 Company Name		Generato	or's Site Addres. 1009 (XXLLAM	s (if different the plate) PLATA No. 1					
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		7. Transporter 2 Company Name	PRODUCTION OF THE PROPERTY OF				U.S. EPAID N	Vumber	<u> </u>		
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		8. Designated Facility Name and Site Address Kettleman thills (WSTE MWWSEMENT) 35751 Old SKyline food Kettleman City, CA. 13239)				U.S. EPA ID N				
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		 ga. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 		ŀ	10. Conta No.	iners Type	11. Total Quantity	12. Unit Wt./Vol.	13. W	/aste Codes	
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		Os de	ete 11-	18-	69						
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		Exporter, I certify that the contents of this consignment conform to the terms of the attached I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large	d EPA Acknowled	ament o	f Consent.			•			
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	20. L	Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered			s noted in Item	18a					
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	1	marked and labeled/placarde	ed, and are in all respects in	proper condition for	transport accordin	ng to applicable int	ternational and nati	ional governm	nental regulations	s. If export ship	pment and I am	the Prima	гу .
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WEIGHT (LB) TIME DATE	COMMODITY: HAZARDOUS WASTE DEPUTY WEIGHMASTER	CHEMICAL WASTE MANAGEMENT, INC. WEIGHMASTER weighed at 35251 Old Skyline Roadt Kettleman City, CA
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GENERATOR MANIFEST PROFILE TRACTOR LICENSE # TRAILER LICENSE NO. BIN #	775755 RECEIPT# 2354 0 0 18	

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	-	5. Generator's Name and Maili	ng Address	39 - 10 - 10 - 10 - 10 - 10 - 10 - 10 - 1	Generator's Site Addres	s (if different th				
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4	1	I certify that the waste minim	nization statement identified in 40 CFR 262.27(a) (if	l am a large quantity gener	ator)-or (b) (if I am a sm	all quantity ger	'erator) is true.			
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YARDAG	E: 16 G	ж	- plante manage James	17	886	§1,2700) of Division 5 of the California Business & Professic Code, administered by the Division of Measurement Standar California Department of Food and Agriculture.
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Form Approved, OMB No. 2050-0039 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 4. Manifest Tracking Number 2. Page 1 of 3. Emergency Response Phone UNIFORM HAZARDOUS 1. Generator ID Number 005417901 WASTE MANIFEST Generator's Site Address (if different than mailing address) 5, Generator's Name and Mailing Address 1994 (150 mm) 1 125 (170 170 170 1846 (1861 Generator's Phone: 6. Transporter 1 Company Name 7. Transporter 2 Company Name U.S. EPA ID Number 8. Designated Facility Name and Site Address C:10074-3617 alian arras at y, at 148787 Facility's Phone: 12. Unit 10. Containers 11. Total 13. Waste Codes 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 9a. Wt./Vol. Quantity No. Type and Packing Group (if any)) НМ 18 En moral carety listen that substance, at Fa, M.C.E. C, Ayoris, Ist ad GENERATOR 2,500, 5, 9, U-337, 9 ANGELONE SON BASE CARD PROVING TABLE 7183 C-778535 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 252.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Day Year Month Generator's/Offeror's Printed/Typed Name 12 29 04 Port of entry/exit: 16. International Shipments Export from U.S. Import to U.S. Date leaving U.S.: Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Materials Signature Transporter 1 Printed/Typed Name TRANSPORT Transporter 2 Printed/Fyped Nan 18 Discrepancy Full Rejection Partial Rejection ___ Residue 18a. Discrepancy Indication Space Quantity Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) DESIGNATED FACILITY Day Year Facility's Phone: Month 18c. Signature of Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 20. Designated Facility Owner or Operator: Certification of peceipt of hazardous materials covered by the manifest except as noted in term 18 Signature Printed/Typed Name DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIR

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

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Form Approved. OMB No. 2050-0039 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 4. Manifest Tracking Number 2. Page 1 of 3. Emergency Response Phone 1. Generator ID Number 005417928 UNIFORM HAZARDOUS JJK WASTE MANIFEST Generator's Site Address (if different than mailing address) 5. Generator's Name and Mailing Address 1005 F555 408 Galgara C.A. Skoffa-8585 Uffa-Generator's Phone: U.S. EPA ID Number 6. Transporter 1 Company Name XEAR DOO LOSSED 7. Transporter 2 Company Name U.S. EPA ID Number 8. Designated Facility Name and Site Address CAN ITS SHA IIII CHI Ebylan Abad all earn by Car 28785 Facility's Phone: 12. Unit 10. Containers 11. Total 9b.-U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 13. Waste Codes Wt./Vol. Quantity and Packing Group (if any)) No. Type НМ 1. Rm. En suchasizay masarioga exharmos, avio M.O.S. (polyomovazaat appanysay, B. J. 2277, W 261 GENERATOR Special Handling Instructions and Additional Information When output PRE significations 15. GENERATOR'S/OFFEROR'S CERVIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Month Day Year Generator's/Offeror's Printed/Typed Name 12 29 OF 16. International Shipments Port of entry/exit: Export from U.S. __Import to U.S. Date leaving U.S.: Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Materials Year Month Signature Transporter 1 Printed/Typed Name millas Transporter 2 Printed/Typed Name Signature 18. Discrepancy Full Rejection Partial Rejection 18a, Discrepancy Indication Space Residue Quantity Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) Facility's Phone: Year Month Day 18c. Signature of Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 14 Day Printed/Typed Name DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

		WEIGHT (LB)	TIME	<u>DATE</u>	COMMODITY: HAZARI	DOUS WASTE	CHEMICAL WASTE MANAGEMENT, INC
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WEIGHT (LB) TIME	DATE	COMMODITY: HAZARDOUS WASTE	CHEMICAL WASTE MANAGEMENT, INC. WEIGHMASTER weighed at
* * *	87 F - 59 -	DEPUTY WEIGHMASTER	35251 Old Skyline Road Kettleman City, CA
GROS\$:			NO: 150872
TARE:		- 1810 A	WEIGHMASTER CERTIFICATE
NET: <u>La cata la reta de la reta</u> dade la YARDAGE :		4444	This is to certify that the following described commodity was weighed, measured, or counted by a WEIGHIMASTER, who signature is on this certificate, who is a recognized authority accuracy, as prescribed by CHAPTER 7 (commencing with §12700) of Division 5 of the California Business & Professic Code, administered by the Division of Measuremen Standar California Department of Food and Agrientture.
TRACTOR LICENSE # TRAILER LICENSE NO.	PROFII BIN#	RECEIPT#	(121) (a)

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4	UNIFORM HAZARDOUS WASTE MANIFEST 1. Generator ID Number 2. Page 1 of	3, Emergency Response Phone	00	541	7930 JJK	
	5. Generator's Name and Mailing Address	Generator's Site Address (if differen	nt than mailing addre	ess)		1
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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: hereby declare that the contents of this consignment	are fully and accurately described a	hove by the proper	hipping name	e, and are classified, package	ed,
1	marked and labeled/placarded, and are in all respects in proper condition for transport according to appli	cable international and national gov	ernmental regulation	ns. If export sh	ipment and I am the Primary	/
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**	'EIGHT (LB)	TIME	DATE	COMMODITY: HAZARDOUS WASTE	CHEMICAL WASTE MANAGEMENT, INC.
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WEIGHT (LB) TIME GROSS:	DATE	COMMODITY: HAZARDOUS WASTE DEPUTY WEIGHMASTER	CHEMICAL WASTE MANAGEMENT, INC WEIGHMASTER weighed at 35251 Old Skyline Road Kettleman City, CA NO:
TARE: NET: 15/00, 19/19/09 (10/00) YARDAGE:	16 AV	100 de 100	WEIGHMASTER CERTIFICATE This is to certify that the following described commodity was weighed, measured, or counted by a WEIGHMASTER, whose signature is on this certificate, who is a coopyaized authority of accuracy, as prescribed by CLAPTER 7 (commencing with §12700) of Division 5 of the California Business & Professions Code, administered by the Division of Measurement Standards of California Department of Food and Agriculture.
TRACTOR LICENSE # TRAILER LICENSE NO.	t t	7553 EPT#	37/2 B

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11 ::	8. Designated Facility Name and Site Address Facility's Phone: 9a. HM and Packing Group (if any))									
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WASTE MANIFEST 5. Generator's Phone: 6. Transporter 1 Company Narge 7. Transporter 2 Company Name 8. Designated Facility Name and Site Address Facility's Phone: 9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 1. Designated Facility's Phone: 2. 25 3. 3. 3. 4. 4. 14. Special Handling Instructions and Additional Information 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment conform to the terms of the attached EPAA I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quant Generator's/Offeror's Printed/Typed Name 16. International Shipments Import to U.S. Export Transporter signature (for exports only): 17. Transporter 1 Printed/Typed Name 18. Designated Facility Name and Site Address 1.5 Company Name 1.5						44377/4443349884000000000000000000000000000000	SANTIAN AND PROPERTY OF THE PR			
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20. Desig Printed/Ty	gnated Facility Owner or Operator: Certification of receipt of hazardous materials cover yped Name	red by the manifes Signat		V18a	1)	Month	Day Year		
Form 87	700-22 (Rev. 3-05) Previous editions are obsolete.	DE	SIGNATED FA		D DESTIN	ATION :	N C STATE (IF	REQUIRED		

WEIGHT (LB) TIME GROSS: 11 STATE ST	DATE 49 · · · · is ·	COMMODITY: HAZARDOUS WASTE DEPUTY WEIGHMASTER	CHEMICAL WASTE MANAGEMENT, INC. WEIGHMASTER weighed at 35251 Old Skyline Road Kettleman City, CA NO: 1507
TARE: NET: YARDAGE:	- 16.	J. 19520	WEIGHMASTER CERTIFICATE This is to certify that the following described commodity was weighed, measured, or counted by a WEIGHMASTER, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by CHAPTER? (commencing with §12700) of Division 5 of the California Business & Professions Code, administered by the Division of Measurement Standards of California Deportment of Food and Agriculture.
TRACTOR LICENSE # TRAILER LICENSE NO.	PROF.	RECEIPT #	(v c

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↑ UNIFORM HAZARDOUS 1. Generator ID Number		2. Page 1 of 3	. Emergency Respo	nse Phone	4. Manifes	t Tracking N	m Approved. (lumber	***************************************	
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GROSS: (C) (c) section ()	A HELL	NO: 150938
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WEIGHT (LB) TIME DATE	COMMODITY: HAZARDOUS WASTE	CHEMICAL WASTE MANAGEMENT, INC. WEIGHMASTER weighed at
anagh i	Up	DEPUTY WEIGHMASTER	35251 Old Skyline Road Kettleman City, CA
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GENERATOR	MANIFEST		California Department of Food and Agriculture
GENERATOR	MANIFEST	PROFILE AS 7575	
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15. GENERATOR'S/OFFEROR'S CERTIF	OSD: 12/30/09 FICATION: I hereby declare that the contents of	this consignment are fully	and accurately de	scribad above	by the proper sl	ninning nam	e and are classi	fied, nackage	ed.
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WEIGHT (LB)	TIME DATE	COMMODITY: HAZARDOUS WASTE DEPUTY WEIGHMASTER	CHEMICAL WASTE MANAGEMENT, INC. WEIGHMASTER weighed at 35251 Old Skyline Road Kettleman City, CA
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	WEIGHT (LB)	TIME	DATE	COMMODITY: HAZARDOUS WASTE DEPUTY WEIGHMASTER	CHEMICAL WASTE MANAGEMENT, IN WEIGHMASTER weighed at 35251 Old Skyline Road Kettleman City, CA
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П	l	Exporter, I certify that the	arded, and are in all respects in contents of this consignment of	ronform to the terms of the a	ort according to ap	piicable inten	national and natio	onal governm	entai regulations.	It export ship	ment and I an	n the Primary	
		I certify that the waste mir	nimization-statement identified	in 40 CFR 262.27(a) (if I am	n a large quantity o	enerator) or ((b) (if I am a smal	l quantity ger	erator) is true.				
	Gene	rator's/Offeror's Printed/F	yped Name			Signature	1 /	11	,		Month	n Day Year	r
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	20. De	signated Facility Owner o	r Operator: Certification of reco	eipt of hazardous materials	covered by the mai	nifest except	as noted in Item	18a					
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	5. G	enerator's Name and Mailir くさの / ス	CACODZGYZ ng Address Aspirac Pu 2 ~ 1 Ave , Sn	blic Schools	Genera	tor's Site Addres	s (if different th	nan mailing addre	ss)			
П			Oak	and CA					7400	_		
Ш	Gene	erator's Phone:510-4 ansporter 1 Coppany Nam	134-5100	and, CA 946	666	00	kla	vd, C	2			
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	1	ansporter 2 Company Nam	•	(.	AHW 1	(1 () £	7	U.S. EPA ID N	Number			
	8. De	esignated Facility Name an	d Site Address	nan Hilly Co	unt Mana	se ~e.24)	<u> </u>	U.S. EPA ID I	Number C	ATOC	2069	1611
			d Site Address # 2 He , 35251	Reman Cit	re Read			CIDS	892	9		,
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	9a. HM	and Packing Group (if a	,			10. Conta	iners Type	11. Total Quantity	12. Unit Wt./Vol.	13. V	Vaste Code	es
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	ł	Exporter, I centify that the c	ontents of this consignment committee in mization statement identified in	ntorm to the terms of the attact	hed EPA Acknowledgment	of Consent			,			-,
	Gener	ator's/Offeror's Printed/Typ	ed Name PANER		Signature	7	1/Ba	1100		Mont		
7	16. Int	ternational Shipments	Import to U.S.		Export from U.S.	Port of en	trylexit:	vec_		1/2	10	101
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		gnature of Alternate Facility	y (or Generator)	· · · · · · · · · · · · · · · · · · ·				1		Mont	h Day	Year
GNA	19. Haz	zardous Waste Report Mar	nagement Method Codes (i.e.,	codes for hazardous waste tre	atment disposal and reco	rcling systems)						1.
	1.	1112	2.		3,	only systems)		4.				
	20. Des	signated Facility Owner or	Operator: Certification of receip	t of hazardous materials cour	red by the manifest ever-	t as noted in liter-	182					7.00
		Typed Name	MINA	20 MARC	Signature	Q ,	100			Month	Day	Year
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	5. Ge	enerator's Name and Mailin	g Address Applice Pal	to 100	General	tor's Site Address ノング	(if different tha	an mailing addres	s) Dv z		
	Gene	erator's Phone: 😂 🌬 🕳	OAKI	and, CA 9461	n6 I	OA	klau	d, CA			
	6. Tra	ansporter_1 Company Nam	WAMA	N TRK				U.S. EPA ID N	lumber A Re	900/5	740
	7. Tra	ansporter 2 Company Nam	ie					U.S. EPA ID N		•	*
	8. De	signated Facility Name an	d Site Address KetVle- 35251 KetV	Cold Struling B	te manage	rev4)		U.S. EPA1D N		iaa ()	16 119
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	$\overline{}$	ity's Phone: 559-38	<u>G ~G く レ レ</u> on (including Proper Shipping Na	ame Hazard Class ID Number		10. Contair	ners	11. Total	12. Unit		•/
	9a. HM	and Packing Group (if a	any))		•	No.	Туре	Quantity	Wt./Vol.	13. Waste	e Codes
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	14. S	Special Handling Instruction	ns and Additional Information		, <u> </u>	<u> </u>					
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		marked and labeled/placa Exporter, I certify that the	OR'S CERTIFICATION: I hereby rded, and are in all respects in p contents of this consignment co	proper condition for transport ac inform to the terms of the attack	is consignment are fully coording to applicable intended ned EPA Acknowledgment	and accurately de emational and nat nt of Consent.	ional govemn	ental regulations	ipping name . If export sh	e, and are classifie ipment and I am th	d, packaged, ne Primary
		I certify that the waste mirerator's/Offeror's Printed/Ty	nimization statement identified in	40 CFR 262.27(a) (if I am a la	rge quantity generator) o	or (b) (if I am a sma	(D			Month	Day Year
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	18a. i	Discrepancy Indication Sp	ace Quantity	Туре		Residue		Partial Re	ection		Full Rejection
<u> </u>	18b. /	Alternate Facility (or Gene	rator)	·		Manifest Reference	e Number:	U.S. EPA ID I	Vumber		
FACI	Facili	ity's Phone:									
DESIGNATED FACILITY	18c. \$	Signature of Alternate Fac	ility (or Generator)	;						Month	Day Year
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		ed/Typed Name	or Operator: Certification of refe	ipt of hazardous materials cove	ered by the manifest exc Signature	ept as noted in Iter	m 18a	Ah		Month	Day Year
Į EP/	Form	n 8700-22 (Rev. 3-05)	Previous editions are obsole	ete.	<u> </u>	NATED FA	CILITY	DESTIN	IATION	STATE (IF	REQUIRED)
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П		nerator's Name and Mailing	Address	_			General	or's Site Address	s (if different th	an mailing addre	ss)			
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Ш		rator's Phone: 50			•					U.S. EPA ID I	lumber			
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Н	-4/	Ansporter 2 Company Name	TRU	CRINE	·	,				U.S. EPAID N	<u>000.</u>	<u> 206></u>	177	
Ш	7. tra	insponer 2 Company Name	•							U.S. EPA IU I	Number			
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!	8. De	signated Facility Name and	Site Address							U.S. EPA ID I				
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П	Facili	ty's Phone:	- 3											<u>.</u>
П	9a.	9b. U.S. DOT Description		Shipping Name, H	azard Class, ID	Number,		10. Conta	iners	11. Total	12. Unit	13 1	Naste Code	
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П	15.	GENERATOR'S/OFFERO	R'S CERTIFICATIO	N: I hereby declar	re that the conte	nts of this consigr	nment are fully	and accurately de	escribed above	e by the proper sh	ipping name	e, and are clas	sified, pack	aged,
П		marked and labeled/placare Exporter, I certify that the c							tional governm	nental regulations	. If export sh	ipment and I	am the Prim	ary
П		I certify that the waste mini							nall quantity ge	nerator) is true.				
П	Gene	erator's/Offeror's Printed/Typ		$\overline{}$			Signature		-			Men	B 000	7 KB
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焙		ty's Phone:		· · · · · · · · · · · · · · · · · · ·					·					
旧	18C. 3	Signature of Alternate Facili	ty (or Generator)									Мо	nth Day	y Year
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ı∺	119. H	lazardous Waste Report Ma	nagement Method	Codes (i.e., codes	for hazardous v	vaste treatment, d		cycling systems)		 ү ;				
lΩ	 			2.			3.			4.				
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	1. 20. D	HI3 Designated Facility Owner of	Operator: Certifica	tion of receipt of h	azardous materi	als covered by the		pt as noted in Ite	m 18a	_				
DES	1. 20. D	resignated Facility Owner or ed/Typed Name	Operator: Certifica	tion of receipt of h	azardous materi	als covered by the	Signature	pt as noted in Ite	7	0000		Mo	nth Day	Year
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1	W	VASTE MANIFEST 0.403385-7715	of 3. Emergency Response Phone	4. Manifest Tracking N	Number 7522 JJK
	5. G	enerator's Name and Mailing Address ଇତ୍ୟକ୍ତ ମଧ୍ୟ ପ୍ରଥମ କ୍ରୟର୍ପ	Generator's Site Address (if different tha	n mailing address)	
		CDE SEES AUS., SES. 199 PERFOR, CA. SESSE	1002 634 Are. Octobro, Ga Si 621-363	5 USA 1	
П	Gene	erator's Phone: 506-434-5037			
	6. Tra	ansporter 1 Company Name M. E. TRUCKONS .		U.S. EPAID Number	185207
	7. Tra	ansporter 2 Company Name		U.S. EPA ID Number	
	12	esignated Facility Name and Site Address ଧାରଣ ପର୍ଷ୍ଟର ଅନ୍ୟୁକ୍ତ ବାସ ସେ ପ୍ରମୟ ଅଧିକ । ବିରୟ ପ୍ରସ୍ଥର ଅଧିକ୍ରୟ ଅଧିକ୍ର		U.S. EPA ID Number	£
		ity's Phone: PSS=RSS-RYC)		1	
	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type	11. Total 12. Unit Quantity Wt./Vol.	I I.A. VVASTE LIDDES
ATOR -		1. Ris, Engren denishy hazzrones substance, ante, Alü.S. Googskorfa Norweyle, S. Casarr, III	2,80 (CT	15 Y	611
GENERATOR		2.			
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		DUTOF SERVICE dal	9083268 79-550 Si	1	
		GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignme marked and labeled/placarded, and are in all respects in proper condition for transport according to ap Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledge.	nt are fully and accurately described above plicable international and national governme	by the proper shipping nam	ne, and are classified, packaged, hipment and I am the Primary
		I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity g	enerator) or (b) (if I am a small quantity gene	erator) is true.	
	Gene		Signature		Month Day Year
<u> </u>	16 In	JONATHAN FAVSTING	Tow -		03/24/10
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		ransporter Acknowledgment of Receipt of Materials	Date leaving U.S.:		·
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ين ا	18a. I	Discrepancy Indication Space Quantity Type	Residue	Partial Rejection	Full Rejection
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FACIL		ity's Phone:		L	
DESIGNATED FACILITY		Signature of Alternate Facility (or Generator)			Month Day Year
SIG	19. H	lazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, dispo	 		
15 -	1.	H132 2		4.	
	20. D	designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the ma			
\downarrow		Enher Adaws	Signature	Q	Month Day Year
EPĀ	Form	n 8700-22 (Rev. 3-05) Previous politions are obsolete.	DESIGNATED FACILITY	DESTINATION	STATE (IF REQUIRED)

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A		IIFORM HAZARDOUS	1. Generator ID Number	2. Page 1 of	3. Emerge	ency Response I	Phone	4. Manifest				v l
T		WASTE MANIFEST	0.0.000357778	4	\$:54 <u>\$</u>	57-1158				<u> 7534</u>	JJ	N
I	5. 0	Generator's Name and Mailir	ng Address					n mailing addre	SS)			
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ı	6.1	Transporter 1 Company Nan		スションナ				IAL	900	3482	25D	
	 -	Transporter 2 Company Na	MAHAL TRANSF	<u>// </u>				U.S. EPA ID	Number			
	"	Hanoportor H VIII.	•					<u> </u>				
	8.	Designated Facility Name a	nd Site Address					U.S. EPA ID	Number	7		
П	1	ESTE! Die Skydne f	1026					die i	a a como militar i	•		İ
		Kademan City, GA						i				1
H	Fa	cility's Phone:	711			40.0.11	· · · · · · · · · · · · · · · · · · ·		1	T		
Н	9:	⁶⁰ 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	ion (including Proper Shipping Name, Hazard Class, ID Nu	mber,		10. Contair No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. V	Vaste Codes	
Н	Н	M and Packing Group (if				4	[]T	16	7	11	-,	
۱۳		" RO, Environin' Distraction, 9, 1	eninky naz <mark>ambous</mark> substance, solid, W.O.S Turkozy m	i (esiya Asans	182	,	50 °	1.0	1	(J/1-)		
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		TR 195	9-9P40156- TR 86	3 6BN	1		<u>l</u>					
	1	4. Special Handling Instructi	ons and Additional Information	21/ 0.	-						- 1	1
1	$\ \cdot \ $	Vier proper PPE t	9-9E40156-TR 86 ons and Additional Information than the TRING TRIES 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	sky.		<		Λ	0- +	ノィー		L. 1
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l	_	- OFWER TORISOFFE	and a second second second second second second second second second second second second second second second	s of this consignmen	nt are fully a	and accurately d	escribed abov	ve by the proper	shipping nar	ne, and are cla	ssified, pack	aged,
	\prod^1	marked and labeled/pla	corded, and are in all respects in proper condition for transi	port according to apt	olicable inte	madonaranu na	tional govern	mental regulation	ns. If export	shipment and I	am the Prim	ary
ł	П	Exporter, I certify that the	e contents of this consignment conform to the terms of the ninimization statement identified in 40 CFR 262.27(a) (if I a	attached EPA Ackno m a large quantity go	owieddinen enerator) o	r (b) (if I am a sm	nali quantity g	enerator) is true.				
-	lt	Generator's/Offeror's Printed	Typed Name	S	Signatur		A			Mo	nth Day	
	$\downarrow \mid$		JONATHAN FAL	STATI	_	W	\leq				3 29	110
_		6. International Shipments	Import to U.S.	Export from	n U.S.		ntry/exit:				7-5	70
1-	_	Transporter signature (for ex	ports only):			Date lea	ving U.S.:		 	•		
		17. Transporter Acknowledgn			Signature		<i>A</i> -	1		Mo	nth Day	Year
	띩	Transporter 1 Printed/Typed		l.	//2	ndle.	MM			6	3 kg	12010
1	핡	fransporter 2 Printed/Typed	Name MANAGE		Signature	7 1	- j: 4			Mo	onth Day	/ Year
	TRANSPORTER			1							L_	
ŀ	_	18. Discrepancy	·									
	1 1	18a. Discrepancy Indication	Space Quantity T	ype		Residue		Partial	Rejection		Full Re	jection
١										٠		1
-	IJ					Manifest Referen	ce Number:	U.S. EPA	ID Number			
1	틹	18b. Alternate Facility (or Ge	enerator)									
-	FACILITY	F954- P!						1		_		
		Facility's Phone: 18c. Signature of Alternate I	Facility (or Generator)								Month D	ay Year
-	闦	· ·										
	DESIGNATED	19. Hazardous Waste Repo	rt Management Method Codes (i.e., codes for hazardous w			ecycling systems)					
Į	띩	1.	127 2		3.			4.				
	١, ١		106				in == 40 - 1					
Ì			ner or Operator: Certification of receipt of hazardous materi	als covered by the m	nanifest exc Signature	ept as noted in I	tem 18a				Ageth D	y Year
		Printed/Typed Name	WOOD ON A CUM	1/3 1	Jigilalare	(&	\checkmark \lor	XL.		1	XIS	57/(
	*	Form 8700 22 (Pay 2 0	5) Previous editions are obsolete.	<u> </u>	DECL	CNATED		TO DEST	ΓΙΝΔΤΙΟ	N STATE	(IF RE	QUIRED
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Keller Canyon Landfill Summary (Ô[} • dˇ &áį } ÄÖ^àlã D

CONTRACT ACTIVITY REPORT

From: Nov 18, 2009 To: Apr 16, 2010 Specified Contract: #8208

				DETAILED REPO	PRT	Ticket Type: A	Il Ticket Types			
icket	Ticket			Billing	Minimum	Maximum	Material	Tax		Contract
Date	Number	Customer	Material	Quantity	Quantity	Quantity	Total	Total	Total	Rate
8208									na, ir mentt vereden til i land graper v	
	l 539451-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	10.69 TN						
	I 539451-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	I 539637-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	13.25 TN						
	539637-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	539729-00	674 7 61-0000 - ICS - NORCAL	SW-CONST DEBRIS	4.96 TN						
20 Nov 09	1 539729-01	674 761- 0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Nov 09	539787-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	8.82 TN						
20 Nov 09	1 539787-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
1 Dec 09	1 541137-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	16.13 TN						
1 Dec 09	1 541137-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
1 Dec 09	541130-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	12.22 TN						
1 Dec 09	I 541130-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
1 Dec 09	I 541204-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	15.33 TN						
Dec 09	1 541204-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	541207-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	15.36 TN						
	1 541207-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	541208-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	12.29 TN						
	1 541208-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	541278-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	12.30 TN						
Dec 09		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
Dec 09		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	2.41 TN						
	541281-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD	.8					
	1 543664-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	17.38 TN						
	543664-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	1 543774-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	20.73 TN						
	543774-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	1 543993-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS							
	1 543993-01	674761-0000 - ICS - NORCAL		12.84 TN						
	1 544032-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	i 544032-00		SW-CONST DEBRIS	16.97 TN						
	544055-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	i 544055-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	20.04 TN						
		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	544276-00 544276-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	19.37 TN						
		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	544297-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	17.51 TN						
	544297-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	545314-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	2.74 TN						
	1 545314-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
so nec 09	545338-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	5.07 TN						

CONTRACT ACTIVITY REPORT From: Nov 18, 2009 To: Apr 16, 2010

#8208

Specified Contract:

DETAILED REPORT Ticket Type: All Ticket Types Ticket Types Ticket Types Ticket Types Ticket Types			- 191
Date Number Customer Material Billing Quantity Quantity Quantity Quantity Total Tax			
28 Dec 09 I 545347-00 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-00 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 28 Dec 09 I 554552-00 674761-0000 - ICS - NORCAL 29 Dec 09 I 554552-00 674761-0000 - ICS - NORCAL 29 Dec 09 I 554552-00 674761-0000 - ICS - NORCAL 29 Dec 09 I 554552-00 674761-0000 - ICS - NORCAL 29 Dec 09 I 554567-00 674761-0000 - ICS - NORCAL 29 Dec 09 I 554567-00 674761-0000 - ICS - NORCAL 29 Dec 09 I 554567-00 674761-0000 - ICS - NORCAL 29 Dec 09 I 554567-01 674761-0000 - ICS - NORCAL 29 Dec 09 I 554567-01 674761-0000 - ICS - NORCAL 29 Dec 09 I 545387-01 674761-0000 - ICS - NORCAL 29 Dec 09 I 545383-01 674761-0000 - I	Total	Contract Rate	kelle
28 Dec 09 I 545347-00 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-00 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 29 Dec 09 I 545383-01 674761-0000 - I	$(j_1, r_1, r_2, f_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, g_2, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, g_2, \dots, g_n)_{i_1, i_2} + g_n(g_1, r_1, \dots, $	wedge of section and produce in the	<u>@</u> ,
28 Dec 09 I 545347-01 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-00 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 29 Dec 09 I 545383-01 674761-0000 - I			
28 Dec 09 I 545383-00 674761-0000 - ICS - NORCAL 28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL 5W-CONST DEBRIS 4.65 TN 54552-00 674761-0000 - ICS - NORCAL 5W-CONST DEBRIS 7.11 TN 545652-01 674761-0000 - ICS - NORCAL 5W-CONST DEBRIS 7.11 TN 54567-00 674761-0000 - ICS - NORCAL 5W-CONST DEBRIS 7.11 TN 54567-01 674761-0000 - ICS - NORCAL 5W-CONST DEBRIS 7.11 TN 545			
28 Dec 09 I 545383-01 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 I 554552-01 674761-0000 - ICS - NORCAL Mar 10 I 554567-00 674761-0000 - ICS - NORCAL Mar 10 I 554567-01 674761-0000 - ICS - NORCAL Mar 10 I 554688-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 I 554648-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 2 W-CONST DEBRIS 1.00 LD 5 W-CONST DEBRIS 1.00 LD 5 W-CONST DEBRIS 1.00 LD 5 W-CONST DEBRIS 1.00 LD 5 W-CONST DEBRIS 1.00 LD 5 W-CONST DEBRIS 1.00 LD 6 W-CONST DEBRIS 1.00 LD 6 W-CONST DEBRIS 1.00 LD 6 W-CONST DEBRIS 1.00 LD 6 W-CONST DEBRIS 1.00 LD			
1 Mar 10 554552-00 674761-0000 - ICS - NORCAL SW-CONST DEBRIS 7.11 TN 1 Mar 10 554567-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 554567-01 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD 1 Mar 10 55468-00			
1 Mar 10 554552-01 674761-0000 - ICS - NORCAL			
1 Mar 10 554567-00			
1 Mar 10 554567-01			
1 Mar 10 554648-00 674761-0000 - ICS - NORCAL SW-CONST DERDIS 40.40 TH			
OFFICE SWATCHERDIC AND TO THE SWATCH			
1 Mar 10 554651 00			
1 Mar 10 564661 04 ST 10 1000 - 103 - NORCAL SW-CONST DEBRIS 12.11 TN			
5 Mar 10 L 555275 00 CTV3-10000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD			
5 Mar 10 1 555275 04 674761-0000 - ICS - NORCAL SW-CONST DEBRIS 4.89 TN			
5 Mar 10 L FESTO 00 FOR THE STATE OF THE STA			
5/4/61-0000 - ICS - NORCAL SW-CONST DERRIS 4.81 TN			
6/4/61-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD			
6/4/61-0000 - ICS - NORCAL SW-CONST DEBRIS 2.24 TN			
Wild 10 1 333299-01 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD			
674761-0000 - ICS - NORCAL SW-CONST DEBRIS 4.79 Th			
5 Mar 10 555369-01 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1 00 LD			
5 Mar 10 1 555370-00 674761-0000 - ICS - NODCAL - SIM CONST DEPOS			
5 Mar 10 1 555370-01 674761-0000 - ICS - NORCAL FNVIRONMENTAL FEE			
6 Mar 10 555422-00 674761-0000 - ICS - NORCAL SW-CONST DEPRIS			
0 Mar 10 1 555422-01 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE			
0 Mar 10 555424-00 674761-0000 - ICS NODCAL SIM CONST BY			
0 MBF 10 1 555424-01 674761-0000 - ICS - NORCAL ENVIRONMENTAL FOR			
0 MAF 10 555571-00 674761-0000 - ICS - NORCAL SW CONST PERPIS			
0 Mar 10 1 555571-01 674761-0000 JCS NODCAL CANADONA TANADONA TANA			
6 MAI 10 1 555638-00 674761-0000 - ICS - NORCAL - CIM CONOT DEPOS			
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8 Mar 10 1 555674 00			
8 Mar 10 555674 01 07 1701 000 100 100 100 100 100 100			
9 Mar 10 555750 00			
9 Mar 10 555750 04 07 1707 070 070 070 070 070 070 070 070			
9 Mar 10 555745 00			
9 Mar 10 555745 04			
9 Mar 10 L 555927 00			
9 Mar 10 555927 04 074761-U000 - ICS - NORCAL SW-CONST DEBRIS 16.95 TN			
9 Mar 10 555837-01 674761-0000 - ICS - NORCAL ENVIRONMENTAL FEE 1.00 LD			

Facility: All Facilities

				DETAILED REPO	RT	Ticket Type: A	Ill Ticket Types				
Ticket	Ticket			Billing	Minimum	Maximum	Material			***	-
Date	Number	Customer	Material	Quantity	Quantity	Quantity	Total	Tax Total	Total	Contract Rate	*
											- <u>*</u>
9 Mar 10	555851-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	16.22 TN							
9 Mar 10	555851-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
10 Mar 10 I	555946-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	15.93 TN							
10 Mar 10 I	555946-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
10 Mar 10 I	555966-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	19.24 TN							
	555966-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	555962-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	18.06 TN							
	555962-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
10 Mar 10 I	556020-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS								
	556020-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	18.82 TN							
	556030-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	1.00 LD							
	556030-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	12.84 TN							
	556050-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	1.00 LD							
	556050-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	13.91 TN							
	556090-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	1.00 LD							
	556090-01	674761-0000 - ICS - NORCAL	_	20.52 TN							
	556126-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556126-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	15.58 TN							
	556156-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556156-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	11.58 TN							
	556180-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD				*			
	556180-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	12.02 TN							
	556196-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556196-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	16.33 TN							
	556220-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556220-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	18.74 TN							
	556230-00		ENVIRONMENTAL FEE	1.00 LD							
	556230-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	15.88 TN							
	556238-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556238-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	14.52 TN							
	556249-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556249-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	23.10 TN							
	556324-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556324-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	15.50 TN							
	556351-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556351-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	21.86 TN							
	556362-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556362-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	23.55 TN							
	556424-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
	556424-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	18.12 TN							
	556460-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
Z MICH TO I	J00400-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	12.68 TN							

CONTRACT ACTIVITY REPORT

a .			From: I	ITRACT ACTIVITY I Nov 18, 2009 To: A fied Contract:	REPORT pr 16, 2010 #8208					925 458 9
Facility: All I	Facilities								Andrews	- 39
- N		The second secon		DETAILED REPO	RT	Ticket Type:	All Ticket Types			
Ticket Date	Ticket Number	Customer	Material	Billing Quantity	Minimum Quantity	Maximum Quantity	Material Total	Tax Total	Total	Contact Rate 5
12 Mar 10 I	556460-01	674704 0000 100 110			4,927,003,607,307,007,000,000,000	Control of the Contro	graphics because commences in the control of the co			
	556480-00	674761-0000 - ICS - NORCAL		1.00 LD						
	556480-01	674761-0000 - ICS - NORCAL		12.69 TN						
	556540-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
13 Mar 10 I	556540-01	674761-0000 - ICS - NORCAL		14.86 TN						
15 Mar 10 I	556688-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
15 Mar 10 I	556688-01	674761-0000 - ICS - NORCAL 674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	15.72 TN						
15 Mar 10 t	556717-00	674761-0000 - ICS - NORCAL		1.00 LD						
15 Mar 10 I	556717-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	21.49 TN						
16 Mar 10 I	557028-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
16 Mar 10 I	557028-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	5.31 TN						
	557070-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
16 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	8.12 TN						
18 Mar 10 i		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
18 Mar 10 I	557467-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	22.65 TN						
18 Mar 10 I	557477-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
18 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS ENVIRONMENTAL FEE	22.05 TN						
18 Mar 10 I	557500-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	1.00 LD						
18 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	23.14 TN						
18 Mar 10 I	557522-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	1.00 LD						
18 Mar 10 I	557522-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	21.51 TN						
18 Mar 10 I	557558-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	1.00 LD						
18 Mar 10 I	557558-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	24.70 TN						
18 Mar 10 I	557572-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	1.00 LD 23.11 TN						
18 Mar 10 I	557572-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
18 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	23.58 TN						
18 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557892-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	24.58 TN						
20 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	20.39 TN						
20 Mar 10 I	557894-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557896-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	24.98 TN						
20 Mar 10 I	557896-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557906-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	24.40 TN						
20 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I 20 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.80 TN						
20 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.37 TN						
20 Mar 10 I :		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 1	557011 04	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.44 TN						
~U Ividi (U I)	001911-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
	·									

Specified Contract:

Facility:	Αll	Facilities
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				DETAILED REPORT		Ticket Type: #	Ill Ticket Types			
Ticket	Ticket			Billing	Minimum	* *	A STATE OF THE STA		Adjustments small and an analysis of the state of the sta	colonograduativativat independentialistic coloniarism
Date	Number	Customer	Material	Quantity	Quantity	Maximum	Material	Tax		Contract
				- Consty	Coorday	Ouantity	Total	Total	Total	93te
20 Mar 10 I	557913-00	674761-0000 - ICS - NORCAL	CW CONOT DEPTH	- 大龙		polyphonic (1998) is a first to the companion of the contraction of th			Color of the color	
	557913-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	22.50 TN						
20 Mar 10 I	557915-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 l	557915-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	22.94 TN						
20 Mar 10 I	557918-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557918-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	23.23 TN						
20 Mar 10 I	557920-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557920-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	22.63 TN						
20 Mar 10 I	557923-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557923-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	23.05 TN						
20 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557930-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.23 TN						
20 Mar 10 I	557934-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557934-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	24.20 TN						
20 Mar 10 I	557936-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557936-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	29.74 TN						
20 Mar 10 I	557941-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557941-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	23.29 TN						
20 Mar 10 f	557944-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557944-01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	28.69 TN						
20 Mar 10 I	557948-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557049.01	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	26.43 TN						
20 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557040 04	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.40 TN						
20 Mar 10 I	557054.00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557954-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	23.65 TN						
20 Mar 10 I	557954-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	557955-UU	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	23.53 TN						
20 Mar 10 I	557955-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I	257956-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.43 TN						
20 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
20 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.59 TN						
20 Mar 10 I	55/958-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
23 Mar 10 I	558225-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	17.57 TN						
23 Mar 10 I	558225-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
23 Mar 10 I 5	558232-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	19.14 TN						
23 Mar 10 5	558232-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
23 Mar 10 I 5	558250-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	13.17 TN						
23 Mar 10 I 5		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
23 Mar 10 I 5	558261-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	22.96 TN						
23 Mar 10 I 5		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD						
23 Mar 10 I 5	558287-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	22.93 TN						

CONTRACT ACTIVITY REPORT From: Nov 18, 2009 To: Apr 16, 2010

Specified Contract #8

		To compare the second s		DETAILED REPO	RT	Ticket Type: A	VI Ticket Types				
Ticket Date	Ticket Number	Customer	Material	Billing Quantity	Minimum Quantity	Maximum Quantity	Material Total	Tax Total	Total	Contract Rate	**************************************
23 Mar 10 I	558287-01	674761-0000 - ICS - NORCAL				State and the state of the stat	a consistent of the desired from the second of the second				
	558298-00		ENVIRONMENTAL FEE	1.00 LD							
23 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	21.50 TN							
	558309-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
23 Mar 10 I		674761-0000 - ICS - NORCAL		18.31 TN							
	558316-00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
23 Mar 10 I	558316-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	21.79 TN							
23 Mar 10 I	558347.00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
23 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	21.82 TN							
23 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
23 Mar 10 I	550305-00 550365.04	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.74 TN							
23 Mar 10 I	558360.00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
23 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	14.56 TN							
23 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
23 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	18.39 TN							
24 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
24 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.40 TN							
24 Mar 10 I	550407-01 658415.00	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
24 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.35 TN							
24 Mar 10 I	550415-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
24 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	22.21 TN							
24 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
24 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	26.61 TN							
26 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
26 Mar 10 I	550024-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.17 TN							
26 Mar 10 I	550024-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
26 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.27 TN							
26 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
26 Mar 10 I	558854.04	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.38 TN							
26 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
26 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.95 TN							
26 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
26 Mar 10 I		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	26.52 TN							
26 Mar 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
26 Mar 10 i		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	26.78 TN							
1 Apr 10		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
1 Apr 10		674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	33.82 TN							
1 Apr 10 I		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
1 Apr 10 1	550004-UU	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	26.24 TN							
1 Apr 10		674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							
•	559941-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	25.95 TN							
1 Apr 10	DD9941-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD							

ME Apr-16-10

925 458 9891

CONTRACT ACTIVITY REPORT

From: Nov 18, 2009 To: Apr 16, 2010 Specified Contract: #8208

925 458 9891

Facility: All Facilities

				DETAILED REPOR	T	Ticket Type:	All Ticket Types				_
Ticket Date	Ticket Number	Customer	Material	Billing Quantity	Minimum Quantity	Maximum Quantity	Material Total	Tax Total	Total	Contract Rate	- \$
									486450004007003045417007		Acquire son or
1 Apr 10	I 559944-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	28.55 TN	0.00	0.00					
1 Apr 10	1 559944-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
2 Apr 10	1 560028-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.14 TN	0.00	0.00					
2 Apr 10	1 560028-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
2 Apr 10	1 560039-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	26.62 TN	0.00	0.00					
2 Apr 10	I 560039-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
2 Apr 10	1 560045-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.92 TN	0.00	0.00					
2 Apr 10	I 560045-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
2 Apr 10	1 560058-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.41 TN	0.00	0.00					
2 Apr 10	1 560058-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
2 Apr 10	560066-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	28.05 TN	0.00	0.00					
2 Apr 10	1 560066-01	674761-0000 - ICS - NORCAL	ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
2 Apr 10	1 560086-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	27.02 TN	0.00	0.00					
2 Apr 10	1 560086-01	674761-0000 - ICS - NORCAL	. ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
2 Apr 10	560097-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	26.59 TN	0.00	0.00					
2 Apr 10	1 560097-01	674761-0000 - ICS - NORCAL	. ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
2 Apr 10	560109-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	26.29 TN	0.00	0.00					
2 Apr 10	560109-01	674761-0000 - ICS - NORCAL	. ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
7 Apr 10	560725-00	674761-0000 - ICS - NORCAL	SW-CONST DEBRIS	20.56 TN	0.00	0.00					
7 Apr 10	1 560725-01	674761-0000 - ICS - NORCAL	. ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
7 Apr 10	560788-00	674761-0000 - ICS - NORCAL	. SW-CONST DEBRIS	19.50 TN	0.00	0.00					
7 Apr 10	I 560788-01	674761-0000 - ICS - NORCAL	. ENVIRONMENTAL FEE	1.00 LD	0.00	0.00					
			CONTRACT TOTALS:								
Material Su	ımmary	Inbound	₹	Outbound	ŗ	Billing					
	y	Weight	Volume Weig			Quantity					
	ONST DEBRIS	2,476.60 TN 2 0.00 TN	2,906.00 YD 0.00 0.00 YD 0.00			6.60 TN 33.00 LD					
	OHMEN TEL					0.00 LD					
TOTALS		2,476.60 TN 2	2,906.00 YD 0.00	TN 0.00	עץ						

CONTRACT ACTIVITY REPORT From: Nov 18, 2009 To: Apr 16, 2010

	.0, 2000	1 O. 7 (p)	10, 20
ecified	Contract:		#8208

5-			From	NTRACT ACTIVIT : Nov 18, 2009 To cified Contract:	Y REPORT : Apr 16, 2010 #8208				925 458 989
Facility: All Facilities		· · · · · · · · · · · · · · · · · · ·	and a special	DETAILED REF	PORT	Ticket Type: All Tic	ket Types		391
Material	Inl Weight	volume	Outb Weight	ound Volume	Billing Quantity	Contract Ordered	Ordered Variance	Total	
			*** RE	PORT MATERIAL	SUMMARY ***		,	maka sang ar Timakigan selebih 1907-1901 ti Timak Tima	
YB - SW-CONST DEBRIS {} - ENVIRONMENTAL FEE	2,476.60 TN 0.00 TN	2,906.00 YD 0.00 YD	0.00 TN 0.00 TN	0.00 YD 0.00 QY	2,476.60 TN 133.00 LD				
TOTALS	2,476.60 TN	2,906.00 YD	0.00 TN	0.00 YD	, ,				

*** REPO	RT SUMMARY	***
Total Tickets	133	
Total Volume	2,906.00	YO
Total Weight	2,476.60	TN
Total Count	133.00	

KELLER CANYON LANDFILL

05:54:06 p.m.

04-16-2010

Vasco Road Landfill Summary (Þ[} ЁÞæ æå[ˇ •ÁĴ[ᠯ)

CONTRACT ACTIVITY REPORT From: Dec 04, 2009 To: Apr 16, 2010 3850Y916805

Specified Contract:

				DETAILED REPOR	रा	Ticket Type: All Ticket Types
Ticket	Ticket			Billing	Minimum	Maximum
Date	Number	Customer	Material	Quantity	Quantity	Quantity
05010404	205					
3850Y9168	305					
8 Dec 09	I 033816-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.23 TN	0.00	0.00
8 Dec 09	1 033802-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.28 TN	0.00	0.00
8 Dec 09	I 033831-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24.23 TN	0.00	0.00
8 Dec 09	I 033819-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.23 TN	0.00	0.00
8 Dec 09	1 033825-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.95 TN	0.00	
8 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.51 TN		0.00
8 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.74 TN	0.00	0.00
8 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL		0.00	0.00
	1 033832-00	021242-0000 - ICS-NORCAL -		20.40 TN	0.00	0,00
8 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.43 TN	0.00	0.00
	1 033873-00		SW-CONT SOIL	21.87 TN	0.00	0.00
8 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.51 TN	0.00	0.00
	1 033869-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.55 TN	0.00	0.00
8 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.66 TN	0.00	0,00
		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	27.11 TN	0.00	0.00
	1 033877-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	15.68 TN	0.00	0.00
	1 033883-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	25.05 TN	0.00	0.00
	1 033891-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.15 TN	0.00	0.00
	1 033912-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24.10 TN	0.00	0.00
	033921-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.41 TN	0.00	0.00
8 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.80 TN	0.00	0.00
	1 033935-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21,42 TN	0.00	0.00
8 Dec 09	1 033933-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.88 TN	0.00	0.00
	1 033985-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	27.91 TN	0.00	0.00
9 Dec 09	1 034003-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.04 TN	0.00	0.00
9 Dec 09	1 034008-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.45 TN	0.00	0.00
9 Dec 09	1 034012-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24.52 TN	0.00	0.00
9 Dec 09	1 034000-00	021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	24.33 TN	0.00	0.00
	1 034004-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.73 TN	0.00	0.00
9 Dec 09		021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	22.37 TN	0.00	0.00
9 Dec 09		021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	19.22 TN		
9 Dec 09		021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	20,19 TN	0,00 0,00	0.00
	1 034031-00	021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	25.16 TN		0.00
9 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL		0.00	0.00
9 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.80 TN	0.00	0.00
9 Dec 09		021242-0000 - ICS-NORCAL -		21.48 TN	0.00	0.00
9 Dec 09		021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	23.46 TN	0.00	0.00
9 Dec 09			EARTH/DIRT/SOIL	20.30 TN	0.00	0.00
		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.38 TN	0.00	0.00
9 Dec 09		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.46 TN	0.00	0.00
a nec na	1 034088-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22,48 TN	0.00	0.00

CONTRACT ACTIVITY REPORT From: Dec 04, 2009 To: Apr 16, 2010 Specified Contract: 3850\gamma16805

Facility: All Facilities

				DETAILED REPORT	•	Ticket Type: All Ticket	Types
Ticket Date	Ticket Number	Customor	Material	Billing	Minimum	Maximum	
116	number	Customer	Material	Quantity	Quantity	Quantity	
Dec 09	I 034091-00	021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	40.00 TN	0.00	0.00	
	1 034095-00	021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	19.28 TN	0.00	0.00	
	1 034096-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.32 TN 23.87 TN	0.00	0.00	
	1 034106-00	021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	20.31 TN	0.00	0.00	
	1 034122-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL		0.00	0.00	
	1 034123-00	021242-0000 - ICS-NORCAL -	EARTH/DIRT/SOIL	21.02 TN 19.85 TN	0.00	0.00	
	1 034143-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.38 TN	0.00	0,00	
	1 034144-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.72 TN	0.00	0.00	
	1 034150-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	15.80 TN	0.00	0.00	
	1 034617-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.71 TN	0.00	0.00	
	I 034618-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.18 TN	0.00	0.00	
	1 034621-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.73 TN	0.00 0.00	0.00	
	1 034622-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.04 TN	0.00	0.00 0.00	
	1 034630-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24.59 TN	0.00	0.00	
	1 034677-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.95 TN	0.00	0.00	
	034682-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	11.34 TN	0.00	0.00	
	034685-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	13.28 TN	0.00	0.00	
	034686-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.29 TN	0.00	0.00	
	034688-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.88 TN	0.00		
	1 034692-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.51 TN	0.00	0.00 0.00	
	1 034722-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.55 TN	0.00	0.00	
	1 034726-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.32 TN	0.00	0,00	
	1 034733-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	29.32 TN	0.00	0.00	
	1 034735-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22,14 TN	0.00	0.00	
	1 034741-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.76 TN	0.00	0.00	
	I 034743-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.02 TN	0.00	0.00	
	1 034784-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.43 TN	0.00	0.00	
	1 034790-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	14.21 TN	0.00	0.00	
	1 034796-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.98 TN	0.00	0.00	
	1 034811-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.05 TN	0.00	0.00	
	1 034821-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.59 TN	0.00	0.00	
	1 034842-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.61 TN	0.00	0.00	
	034855-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	15.97 TN	0.00	0.00	
	1 034860-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.78 TN	0.00	0.00	
	034868-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.12 TN	0.00	0.00	
	034871-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.68 TN	0.00	0.00	
	034889-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.12 TN	0.00	0.00	
	034905-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	14.86 TN	0.00	0.00	
	1 034912-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.82 TN	0.00	0.00	
	1 034923-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.24 TN	0.00	0.00	
	1 034927-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.24 TN	0.00	0.00	
	. 53 1027 00		OTT GOIL	19.21 111	0.00		

CONTRACT ACTIVITY REPORT From: Dec 04, 2009 To: Apr 16, 2010

Specified Contract:

3850Y916805

				DETAILED REPOR	eT	Ticket Type: All Ticket Types
Ticket	Ticket			Billing	Minimum	Maximum
Date	Number	Customer	Material	Quantity	Quantity	Quantity
477 5						
	035182-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.33 TN	0.00	0.00
	035187-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.75 TN	0.00	0.00
	035196-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.97 TN	0.00	0.00
	035202-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.88 TN	0.00	0.00
	035207-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.73 TN	0.00	0.00
	035213-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.62 TN	0.00	0.00
	035230-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.09 TN	0.00	0.00
	035234-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24.56 TN	0.00	0.00
	035240-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.44 TN	0.00	0.00
	035244-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.25 TN	0.00	0.00
7 Dec 09 I	035250-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.34 TN	0.00	0.00
7 Dec 09 l	035255-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.21 TN	0.00	0.00
7 Dec 09 1	035259-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.67 TN	0.00	0.00
17 Dec 09 1	035264-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.63 TN	0.00	0.00
7 Dec 091	035293-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.51 TN	0.00	0.00
7 Dec 091	035301-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.59 TN	0.00	0.00
17 Dec 09 1	035305-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.09 TN	0.00	0.00
17 Dec 09 I	035311-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	15.81 TN	0.00	0.00
17 Dec 09 1	035317-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.23 TN	0.00	0.00
	035324-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.45 TN	0.00	0.00
	035329-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.99 TN	0.00	
	035395-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL			0.00
	035399-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.79 TN	0.00	0.00
	035406-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.33 TN	0.00	0.00
	035415-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.93 TN	0.00	0.00
	035444-00	021242-0000 - ICS-NORCAL -		16.78 TN	0.00	0.00
	035452-00		SW-CONT SOIL	21.91 TN	0.00	0.00
		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.17 TN	0.00	0.00
	035466-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.19 TN	0.00	0.00
	035470-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.46 TN	0.00	0.00
	035477-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.12 TN	0.00	0.00
	035483-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.38 TN	0.00	0.00
	035488-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.83 TN	0.00	0.00
	035500-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.52 TN	0.00	0.00
	035503-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.45 TN	0.00	0.00
	035506-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.57 TN	0.00	0.00
	035514-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20,02 TN	0.00	0.00
	035521-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.51 TN	0.00	0.00
	035523-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.00 TN	0.00	0.00
	035549-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.30 TN	0.00	0.00
	035550-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.00 TN	0.00	0.00
19 Dec 09 l	035551-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.95 TN	0.00	0.00

CONTRACT ACTIVITY REPORT From: Dec 04, 2009 To: Apr 16, 2010 Specified Contract: 3850\916805

				DETAILED REPOR	₹Т	Ticket Type: All Ticket Types	
icket	Ticket			Billing	Minimum	Maximum	
Date	Number	Customer	Material	Quantity	Quantity	Quantity	
				· · · · · · · · · · · · · · · · · · ·			The second secon
19 Dec 09	035556-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.20 TN	0.00	0.00	
	035561-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.20 TN	0.00	0.00	
	035557-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.39 TN	0.00	0.00	
	035560-00	021242-0000 - ICS-NORCAL -		20.63 TN	0.00	0.00	
	1 035563-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.74 TN	0.00	0.00	
	035565-00		SW-CONT SOIL	18.79 TN	0.00	0.00	
	I 035579-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.87 TN	0.00	0.00	
		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.40 TN	0.00	0.00	
	035582-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.31 TN	0.00	0.00	
	035584-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.41 TN	0.00	0.00	
	035589-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.73 TN	0.00	0.00	
	035593-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.80 TN	0.00	0.00	
	035597-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.43 TN	0.00	0.00	
	035599-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.11 TN	0.00	0.00	
19 Dec 09	035603-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.70 TN	0.00	0.00	
19 Dec 09	I 035604-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.40 TN	0.00	0.00	
19 Dec 09	035617-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	25.35 TN	0.00	0.00	
19 Dec 09	035618-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.73 TN	0.00	0.00	
19 Dec 09	035621-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.85 TN	0.00	0.00	
19 Dec 09	035626-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.44 TN	0.00	0.00	
19 Dec 09	035628-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.83 TN	0.00	0.00	
	035872-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.34 TN	0.00	0.00	
	035877-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.70 TN	0.00	0.00	
	1 035878-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.19 TN	0.00		·
	035882-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.25 TN	0.00	0.00	
	035885-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.42 TN		0.00	
	1 035887-00	021242-0000 - ICS-NORCAL -			0.00	0.00	
	I 035890-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.52 TN	0.00	0.00	
	1 035894-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.00 TN	0.00	0.00	
	03594-00 035912-00		SW-CONT SOIL	22.68 TN	0.00	0.00	
	I 035912-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.69 TN	0.00	0.00	
		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.28 TN	0.00	0.00	
	035937-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.27 TN	0.00	0.00	
	035940-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.91 TN	0.00	0.00	
	035948-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.86 TN	0.00	0.00	
	035950-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.90 TN	0.00	0.00	
	035953-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.76 TN	0.00	0.00	
	035958-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.66 TN	0.00	0.00	
	035961-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.75 TN	0.00	0.00	
	I 035966-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.10 TN	0.00	0.00	
	1 035984-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.64 TN	0.00	0.00	
22 Dec 09	1 035991-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.06 TN	0.00	0.00	
22 Dec 09	1 035995-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.76 TN	0.00	0.00	

CONTRACT ACTIVITY REPORT From: Dec 04, 2009 To: Apr 16, 2010 Specified Contract: 3850\g16805

Facility: All Facilities

				DETAILED REPORT		Ticket Type: All Ticket Types	
Ticket	Ticket	•		Billing	Minimum	Maximum	
Date	Number	Customer	Material	Quantity	Quantity	Quantity	
22 Dec 09:	1 036009-00	021242-0000 - ICS-NORCAL -	SW CONT COU	DO EC TAL	2.00	2.22	
	036013-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL SW-CONT SOIL	20.56 TN	0.00	0.00	
	036015-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.50 TN	0.00	0.00	
	1 036018-00	021242-0000 - ICS-NORCAL -		20.35 TN	0.00	0.00	
	1 036023-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.85 TN	0.00	0.00	
	1 036023-00		SW-CONT SOIL	21.71 TN	0,00	0.00	
	1 036026-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.22 TN	0.00	0.00	
		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.04 TN	0.00	0.00	
	036657-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.41 TN	0.00	0.00	
	037036-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	29.96 TN	0.00	0.00	
	037110-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.95 TN	0.00	0.00	
	037112-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.08 TN	0.00	0.00	
	037116-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.30 TN	0.00	0.00	
	037120-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.97 TN	0.00	0.00	
	037123-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.38 TN	0.00	0.00	
	037128-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.34 TN	0.00	0.00	
	037135-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.73 TN	0.00	0.00	
	037143-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.02 TN	0.00	0.00	
	037142-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.77 TN	0.00	0.00	
	037146-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24.39 TN	0.00	0,00	
	1 037151-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.58 TN	0.00	0.00	
	1 037179-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24,16 TN	0.00	0.00	
	1 037169-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	15.40 TN	0.00	0.00	
	1 037186-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.45 TN	0.00	0.00	
	J 037188-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.09 TN	0.00	0.00	
31 Dec 09	I 037170-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.89 TN	0.00	0.00	
31 Dec 09	I 037173-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.32 TN	0.00	0.00	
31 Dec 09	l 037176-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.54 TN	0.00	0.00	
31 Dec 09	l 037183-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.86 TN	0.00	0.00	
31 Dec 09	I 037187-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.83 TN	0.00	0.00	
31 Dec 09	037193-00	021242-0000 - ICS-NORCAL, -	SW-CONT SOIL	19.29 TN	0.00	0.00	
31 Dec 09	037194-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22,42 TN	0.00	0.00	
31 Dec 09	037196-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.32 TN	0.00	0.00	
31 Dec 09	037218-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.22 TN	0.00	0.00	
31 Dec 09	I 037221-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.49 TN	0.00	0.00	
31 Dec 09	1 037225-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.84 TN	0.00	0.00	
4 Jan 10	1 037412-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.51 TN	0.00	0.00	
4 Jan 10	037415-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.79 TN	0.00	0.00	
	1 037423-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.48 TN	0.00	0.00	
4 Jan 10		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.46 TN	0.00	0.00	
4 Jan 10	1 037439-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.95 TN	0.00	0.00	
4 Jan 10	1 037440-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	26.11 TN	0.00	0.00	

CONTRACT ACTIVITY REPORT From: Dec 04, 2009 To: Apr 16, 2010

Specified Contract:

3850\916805

				DETAILED REPOR	<u>RT</u>	Ticket Type: All Ticket Types		
cket	Ticket			Billing	Minimum	Maximum		
ite	Number	Customer	Material	Quantity	Quantity	Quantity	 	
						•		
Jan 10	1 037444-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	25.80 TN	0.00	0.00		
Jan 10	037446-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.14 TN	0.00	0.00		
Jan 10	I 037461-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.54 TN	0.00	0.00		
Jan 10	I 037457-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	18.24 TN	0.00	0.00		
Jan 10	1 037460-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.81 TN	0.00	0.00		
Jan 10	1 037472-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.98 TN	0.00	0.00		
Jan 10	I 037475-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.71 TN	0.00	0.00		
Jan 10	I 037512-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.34 TN	0.00	0.00		
Jan 10	I 037518-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.00 TN	0.00	0.00		
Jan 10	1 037520-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.65 TN	0.00	0.00		
Jan 10	i 037521-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.12 TN	0.00	0.00		
Jan 10	1 037526-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24,92 TN	0.00	0.00		
	I 037531-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.34 TN	0.00	0.00		
Jan 10	1 037538-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.77 TN	0.00	0.00		
	1 037550-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.87 TN	0.00	0.00		
	1 037552-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.12 TN	0.00	0.00		
	1 037583-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.51 TN	0.00	0.00		
	1 037590-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	17.34 TN	0.00	00,0		
	1 037607-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	25.54 TN	0.00	0.00		
	1 037612-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.99 TN	0.00	0.00		
	1 037613-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	24.90 TN	0.00			
	1 037684-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	16.96 TN		0.00		
	1 037685-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL		0.00	0.00		
Jan 10		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.72 TN	0.00	0.00		
	1 037698-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	23.32 TN 25.11 TN	0.00	0.00		
	1 037705-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL		0.00	0.00		
	I 037718-00	021242-0000 - ICS-NORCAL -		18.96 TN	0.00	0.00		
	1 037733-00		SW-CONT SOIL	16.69 TN	0.00	0.00		
	I 037736-00	021242-0000 - ICS-NORCAL - 021242-0000 - ICS-NORCAL -	SW-CONT SOIL	27.99 TN	0.00	0.00		
	1 037742-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.71 TN	0.00	0.00		
	1 037745-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL SW-CONT SOIL	25.02 TN	0.00	0.00		
	1 037756-00			18.26 TN	0.00	0.00		
	1 037764-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20,95 TN	0.00	0.00		
	1 037765-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.05 TN	0.00	0.00	-	
		021242-0000 - ICS-NORCAL -	SW-CONT SOIL	22.34 TN	0.00	0.00		
	1 037769-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	27.85 TN	0.00	0.00		
Jan 10	I 037770-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.69 TN	0.00	0.00		
Jan 10	1 037794-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	20.57 TN	0.00	0.00		
	037796-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.94 TN	0.00	0.00		
	1 037812-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	28.34 TN	0.00	0.00		
	I 037816-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	21.18 TN	0.00	0,00		
Jan 10	1 037819-00	021242-0000 - ICS-NORCAL -	SW-CONT SOIL	19.39 TN	0.00	0.00		

CONTRACT ACTIVITY REPORT From: Dec 04, 2009 To: Apr 16, 2010

Specified Contract:

3850Y916805

Facility: All Facilities			DETAILED REPOR	T	Ticket Type: A	JI Ticket Types	
Ticket Ticket Date Number	Customer	Material	Billing Quantity	Minimum Quantity	Maximum Quantity		
5 Jan 10 037824-00 5 Jan 10 037825-00 5 Jan 10 037838-00 5 Jan 10 037839-00 6 Jan 10 037905-00 6 Jan 10 037959-00	021242-0000 - ICS-NORCAL - 021242-0000 - ICS-NORCAL - 021242-0000 - ICS-NORCAL - 021242-0000 - ICS-NORCAL -	SW-CONT SOIL SW-CONT SOIL SW-CONT SOIL SW-CONT SOIL	26.29 TN 20.46 TN 22.06 TN 24.25 TN 19.25 TN 19.03 TN	0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00		
		CONTRACT TOTALS	:				
Material Summary	Inbound Weight		Outbound Veight Volum		Billing Quantity	Contract Ordered	Ordered Variance
CE - EARTH/DIRT/SOIL VG - SW-CONT SOIL	0.00 TN 4,867.25 TN		79 TN 0.00 Y		4.79 TN 7.25 TN	0.00 0.00	234.79 4,867.25
TOTALS	4,867.25 TN	0.00 YD 234.	79 TN 0.00	n 5	102.04	Tons	

Attachment 5

Operations and Maintenance Plan and Soil Management Plan



Aspire Public Schools - College for Certain, LLC

Operation and Maintenance Plan for Cap Mitigation Measures

Aspire Public Schools - College for Certain, LLC Former Pacific Electric Motors Site 1009 66th Avenue Oakland, California (Alameda County Department of Environmental Health Fuel Leak Case Number RO0000411)

May 2014



Ron Goloubow, P.G. (8655) Principal Geologist

Operation and Maintenance Plan for Cap Mitigation Measures

Aspire Public Schools - College for Certain, LLC Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California (Fuel Leak Case Number RO0000411)

Prepared for:

Aspire Public Schools -College for Certain, LLC 1001 22nd Avenue Suite 100 Oakland, California 94606

Prepared by: ARCADIS U.S., Inc. 2000 Powell Street, Suite 700 Emeryville, CA 94608 Tel 510 652 4500 Fax 510 652 4906

Our Ref.:

EM009155.0010

Date:

May 2014

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Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

1. Operation and Maintenance Overview

1.1 Introduction

On behalf of Aspire Public Schools (Aspire) and College for Certain, LLC (CFC), ARCADIS U.S., Inc. (ARCADIS) has prepared this Operation and Maintenance (O&M) Plan for the surface cap installed at the former Pacific Electric Motors (PEM) site located at 1009 66th Avenue, Oakland, California (the Site; Figures 1 and 2). The purpose of the surface cap is to mitigate the exposure to soil containing polychlorinated biphenyls (PCBs) and other contaminants (e.g., lead and arsenic) at the Site. The surface cap will be in place at the Site in perpetuity. Should the land use change and/or the current structures (e.g., foundations, slab, pavement, and landscape areas that comprise the cap) are to be modified and/or removed, then the land owner will be obligated to contact the U.S. Environmental Protection Agency (USEPA) and the Alameda County Department of Environmental Health (ACEH) to present the new land use and plan to mitigate soil containing PCB, lead, and arsenic that is present at the Site. The USPEA and ACEH will be notified of a proposed change to the surface cap at least two weeks prior to the scheduled work.

Specific sampling and health and safety procedures to be implemented during future site modification that could disturb site soil, such as the repair of a subsurface utility at the Site, are presented in the Soil Management Plan (SMP) that is included as Appendix B to this document.

This O&M Plan is incorporated into the Land Use Covenant that is to be placed on the deed for this property. This O&M Plan includes procedures for:

- Long-term operation, maintenance, monitoring (inspection), and repair of the engineering controls (i.e., the cap [including all of its components]) in perpetuity; and
- 2. Management of soils containing PCBs and other contaminants at the Site.

1.2 Background

Activities conducted at the Site by previous owners and operators of the property resulted in the presence of soil containing total petroleum hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), arsenic, lead, semivolatile organic compounds (SVOCs), PCBs, and volatile organic compounds

Operation and Maintenance Plan for Cap Mitigation Measures

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

(VOCs). The removal action(s) were conducted in accordance with the following documents:

- Revised Corrective Action Plan, Proposed Aspire High School Site, 1009 66th Avenue, Oakland, California, dated July 17, 2009 (the revised CAP; ARCADIS 2009a).
- Self-Implementing Cleanup Plan (SICP) presented in a letter to the USEPA dated October 23, 2009 (ARCADIS 2009b) as modified by ARCADIS' November 18, 2009 (ARCADIS 2009c) and January 14, 2010 (ARCADIS 2010a) letters and USEPA's conditional approvals.
- USEPA's November 13, 2009 letter conditionally approving (Original Approval)
 ARCADIS' SICP (USEPA 2009a) and USEPA's amendments to that approval
 (Subsequent Approvals) dated April 5 and June 16, 2011 (USEPA 2011a, 2011b).
 USEPA's Original and Subsequent Approvals modified ARCADIS' SICP and
 ARCADIS' amendments to the SICP.

In order to mitigate any exposure to soil containing PCBs that is present at the Site, CFC has installed a surface cover (a cap) across the entire Site consisting of both hardscaped and landscaped areas. Details regarding this cap are provided on Figure 3. The thicknesses of the various elements of the cap were approved by the USEPA in their letters to CFC dated April 5 and June 16, 2011 (USEPA 2011a, USEPA 2011b).

1.2.1 Revised Corrective Action Plan

The Revised CAP summarized the results of previous investigations, presented the site conceptual model, quantified the baseline risk of constituents of concern (COCs), developed site-specific risk-based cleanup goals, evaluated potential remedies, and presented an implementation plan for the selected remedies. Remedial activities conducted at the Site included completion of the excavation activities as presented in the Revised CAP (ARCADIS 2009a) and the operation of the soil-vapor extraction/air sparging (SVE/AS) system. The revised CAP was approved by the ACEH in their letter to Aspire dated August 13, 2009 (ACEH 2009). The implementation of the CAP was reported to ACEH (and USEPA) in the report titled "Soil Removal Action Completion Report, College for Certain, LLC, Former Pacific Electric Motors, 1009 66th Avenue, Oakland, California (Fuel Leak Case No. RO0000411)," dated September 15, 2010 (ARCADIS 2010c). In addition, areas of PCB-containing soil were remediated in accordance with the CAP, the SICP submitted to the USEPA on October 23, 2009

Operation and Maintenance Plan for Cap Mitigation Measures

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

(ARCADIS 2009b), the response letter from U.S.EPA dated November 13, 2009 (USEPA 2009a), and ARCADIS' response letters to EPA dated November 18, 2009 (ARCADIS 2009c) and January 14, 2010 (ARCADIS 2010a). The configuration of the cap presented in Section 3 was presented in a letter to the USEPA by ARCADIS dated April 25, 2011 and the configuration of the cap was approved by USEPA in a letter dated June 16, 2011.

1.2.2 Self-Implementing Cleanup Plan

To address building materials and soil containing PCBs at the Site, ARCADIS prepared a SICP and submitted the document to the USEPA on October 23, 2009 (ARCADIS 2009b). The SICP received conditional approval from the USEPA in its letter to Aspire dated November 13, 2009 (Approval Letter; USEPA 2009a). The conditions provided in the Approval Letter were addressed in a letter transmitted by ARCADIS to the USEPA dated November 18, 2009 (ARCADIS 2009c). The scope of the SICP was further refined in an e-mail message from representatives of the USEPA to ARCADIS dated November 25, 2009 (USEPA 2009b).

The removal of the soil (and building materials) containing PCBs was documented in a letter report that was prepared in accordance with the Toxic Substance Control Act (TSCA) and transmitted to USEPA on August 13, 2010 (the TSCA Report; ARCADIS 2010b) and the Revised PCB Cleanup Completion Report dated May 16, 2014 (ARCADIS 2014).

The SICP addressed the following PCB-related issues:

- The demolition of structures and associated infrastructure formerly located on the Site.
- The collection and analysis of additional soil samples and samples of the building materials associated with the former warehouses that were demolished in January 2010.
- The remediation (excavation) of four areas of the Site where soil containing PCBs had been identified through soil samples collected at the Site.

Following the implementation and completion of the SICP activities, ARCADIS prepared a summary letter report documenting the removal of the PCB-containing soil at the Site (the Summary Report; ARCADIS 2010c). That report was prepared in

Operation and Maintenance Plan for Cap Mitigation Measures

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

accordance with §40 Code of Federal Regulations (CFR) §761.125(c)(5) to describe the implementation of the TSCA SICP at the Site.

As discussed in conference calls and through the exchange of e-mail messages, the analytical results of confirmation soil samples collected at some locations at the Site during the SICP indicate that there are 12 locations where PCB-containing soil at concentrations greater than the cleanup criteria of 0.130 milligram per kilogram (mg/kg) is still present at the Site after the SICP was completed and prior to grading at the Site (ARCADIS 2014). The locations of the confirmation soil samples that contained PCB at concentrations greater than the cleanup criteria are illustrated on Figure 3. However, due to geotechnical work conducted to strengthen site soils for the redevelopment of the Site, the soil currently in those 12 locations may have been mixed with other soils. Thus the PCB-containing soil may be at locations that are not represented by the samples collected in those locations before the geotechnical and grading work. The geotechnical work to strengthen the soil included the cement treatment of the upper 18 inches of soil across the Site. This may have resulted in the movement of soil at the 12 locations where PCBs were detected at concentrations greater than the cleanup goal. ProUCL calculations prior to grading and geotechnical work at the site demonstrated a 95% Upper Confidence Limit (UCL) of PCB containing soil of 0.174 mg/kg total PCBs for the Site, which was slightly higher than the cleanup level of 0.130 total PCBs. However, the soils are covered by the cap.

In addition, approximately 25 yards of soil that contained PCBs at concentrations greater than the cleanup criteria were excavated and placed on site within the area of the Site where soil containing PCBs was already to remain in place at soil sample locations W1-WSDWall 2' and W2-WSDWall 2' (depicted on Figure 3). The encapsulated soil was placed at an elevation of approximately 2.5 to 3 feet set to the City of Oakland Vertical Datum, which is equivalent to approximately 5 feet below the surface of the pavement in this area of the Site. The excavation where the soil was placed was lined with Geotextile fabric and the soil was also covered with Geotextile fabric prior to raising the grade and compacting the area.

As presented in the Revised PCB Cleanup Completion Report (ARCADIS 2014), the following measures have been implemented at the Site to mitigate potential exposure to these soils and ensure these measures remain effective over time:

- Installation of TSCA cap across the surface of the Site
- Preparation of a Land Use Covenant

Operation and Maintenance Plan for Cap Mitigation Measures

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

Preparation of this O&M Plan (including the SMP)

The mitigation measures were implemented consistent with USEPA's requirements in its June 16, 2011 letter modifying the Original Approval and the TSCA PCB regulations in 40 CFR 761.61(c). In order to prevent future exposures to soil at the Site that contains PCBs at concentrations greater than 0.130 mg/kg, a cap consisting of both hardscaped and landscaped areas was installed over the entire Site. Details regarding this cap are provided on Figure 3. An O&M program consisting of inspections, maintenance, and repairs to the cap is required for implementation in perpetuity by the owner of the property to protect the installed cap and ensure the cap continues to provide adequate protection to site users. Intrusive activities, as defined in Section 5, are prohibited at the school site unless USEPA and the ACEH and other applicable regulatory agencies are notified of such planned modifications to the cap, the notification includes detailed plans describing the intended modifications, and USEPA and ACEH approve such modifications. In addition, such modifications must be consistent with the provisions of the Land Use Covenant for the Aspire Golden State College Preparatory Academy. The O&M Plan, if acceptable to USEPA, may be used to draft the environmental restrictions of the Land Use Covenant. The USPEA and ACEH will be notified of a proposed change to the surface cap at least two weeks prior to the scheduled work.

1.3 Operation and Maintenance Goals and Objectives

The primary goals of the O&M Plan are: (1) to prevent exposure to the soil containing PCBs; and (2) to protect the health of students, faculty, staff, O&M personnel, and visitors at the school site.

In order to accomplish these goals, the O&M Plan will address the following objectives:

- Minimize disturbances of PCB-containing soils;
- Describe the mitigation remedy, including the installed cap systems;
- Establish an inspection, maintenance, and repair program to identify areas of exposed PCB-containing soils or damaged cap system, and evaluate ongoing remedy effectiveness;
- Provide for timely repair or replacement, as needed, to restore damaged cap systems (repairs to the cap will be completed within 45 days of their discovery);

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Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

- Provide for record-keeping of inspections, maintenance, repairs, and reporting;
 and
- Maintain the records of inspections, maintenance, and repairs at the offices of both CFC and Aspire.

1.4 O&M Personnel Roles and Responsibilities

CFC will retain or employ and designate the following key O&M personnel responsible for implementing the O&M Plan at the school site: O&M Coordinator and O&M Professional. When necessary, the school will employ qualified contractors who will follow the SMP to perform intrusive work impacting the installed cap system at the school site. The SMP is included as Appendix B.

The names, contact information, and roles and responsibilities of key O&M personnel are included in the following sections.

1.4.1 O&M Coordinator

The O&M Coordinator will have knowledge of the site conditions including the presence of the PCB-containing soil, the presence of the cap mitigating exposure to the soil, and the O&M requirements related to the cap. The role of the O&M Coordinator is to work with the O&M Professional to ensure that the O&M Plan is implemented at the Site.

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The responsibilities of the O&M Coordinator are to:

• Implement the O&M Plan;

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Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

- Be familiar with site conditions and cap systems installed at the school site;
- Evaluate work orders to determine if work will disturb the cap and native soil;
- Coordinate the intrusive work once the work has been approved by the USEPA and ACEH;
- Accompany the O&M Professional during annual inspections;
- Submit the Annual Inspection Summary Reports, and Intrusive Work Completion/Incident Reports to USEPA and ACEH;
- Ensure the retention of reports, forms, and records for five years; and
- Ensure that activities that may disturb the cap will not be conducted at the school site without the knowledge and approval of the O&M Coordinator and prior to USEPA/ACEH approval.

Note: The O&M Coordinator cannot make decisions regarding the cap without the approval of USEPA and ACEH when those decisions require regulatory agency involvement and approval.

1.4.2 O&M Professional

The O&M Professional shall conduct the annual inspections. The O&M professional is defined as a California-registered engineer or geologist with expertise in conducing soil investigation and remediation (e.g., an engineer or geologist who is familiar with the cap system installed at the school site). The responsibilities of the O&M Professional are to:

- Conduct annual inspections in accordance with Section 4.1 below;
- Prepare and sign Annual Inspection Summary Reports; and
- Perform other environmental professional work related to the school site.



Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

2. Site Description

The Site is located on the northwestern side of 66th Avenue between East 14th Street and San Leandro Street (Figures 1 and 2). The area around the Site is developed with a mixture of commercial, industrial, government, and multi-family residential buildings. The Site is currently owned by Aspire (CFC is a limited liability partnership that was formed by Aspire). Additional historical land use information for the Site was presented in the Revised CAP (ARCADIS 2009a).

The first industrial development of the property occurred around 1948 when the two buildings were constructed by PEM. PEM occupied the Site from 1948 to 2001. Activities conducted at the Site by PEM included manufacturing specialty magnets, power supplies, and components, and repairing motors, generators, transformers, and magnets. A 2,000-gallon gasoline underground storage tank (UST) was reportedly installed at the Site by PEM in 1975. In addition, the gasoline shed in the fueling area may have stored vehicle lubricants and oil for vehicle maintenance.

The structures that were on the property were demolished between November 2009 and February 2010 and the property was redeveloped into a school between March 2010 and September 2011. There are plans to construct a gymnasium at the Site in the summer of 2015.

2.1 Previous Site Investigations and Mitigation

PEM removed the 2,000-gallon gasoline UST and associated pump island, piping, storage shed, and appurtenances in 1995. The UST was reportedly in good condition with no holes evident; however, free-phase gasoline product was observed on the water surface in the tank excavation (W.A. Craig 1997). Approximately 1,500 cubic yards of soil were removed in two excavation iterations completed during 1995 and stockpiled on the northern portion of the Site. Approximately 116,000 gallons of petroleum hydrocarbon-contaminated ground water were pumped from the excavation. Site investigation work during this time also included drilling GeoProbe borings (between excavation iterations) in an attempt to define the lateral and vertical extent of gasoline constituents. A dewatering sump used during soil excavation was later converted to an 8-inch-diameter well (thought to be WAC-1) during backfilling operations. Backfill reportedly consisted of clean, imported fill material. Reports indicate that the stockpiled excavated soils were disposed of in 1997 (W.A. Craig 1995a, 1995b, 1995c, 1997).

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A 30-foot-wide by 70-foot-long by 9-foot-deep excavation for the remediation of petroleum hydrocarbon-contaminated soils was completed in April 2002 to the south of the original UST remedial excavation (Decon 2002a,b; Figure 2). Approximately 65,000 gallons of petroleum hydrocarbon-contaminated groundwater were removed from the excavation. Additional over-excavation was performed southeast of the 30-foot by 70-foot excavation. During backfill operations, an 8-inch-diameter extraction well was installed (EW-1). The excavation was backfilled with an unspecified depth of drain rock. Approximately 250 pounds of oxygen-releasing compound (ORC) slurry were mixed into the gravel fill. Clean, excavated native soil and imported Class II base rock comprised the balance of the backfill. Approximately 219 tons of petroleum hydrocarbon-contaminated soil were disposed of at an off-site facility (Decon 2002a,b). The name of the off-site disposal facility was not provided in the 2002 report.

In addition, in June 2002, a total of 25 soil borings were advanced to a depth of 13 feet below ground surface in the area of the former gasoline UST. Each of these borings was backfilled with 8 pounds of ORC followed by neat cement. ORC socks were also installed in wells MW-1 and WAC-1 (Decon 2002a,b).

2.2 Revised Corrective Action Plan

ARCADIS prepared the Revised CAP for the implementation of site remedies (ARCADIS 2009a). The Revised CAP summarized the results of previous investigations, presented the site conceptual model, quantified the baseline risk of COCs, developed site-specific risk-based cleanup goals, evaluated potential remedies, and presented an implementation plan for the selected remedies.

The Revised CAP recommended excavation and off-site disposal of contaminated shallow soils with SVE/AS to remediate contaminated soil, groundwater, and soil vapors (ARCADIS 2009a). The Revised CAP also recommended conducting an extended SVE/AS pilot test including ozone injection, if appropriate.

2.2.1 Soil Excavation and Removal

Between November 2009 and August 2010, soil excavation activities were completed at the Site. This work resulted in the removal of approximately 8,400 tons of contaminated soil from the Site. Depending on waste constituents and their concentrations, the waste was transported to either Chemical Waste Management Hazardous Waste Landfill located in Kettleman City, California or Republic Waste's Vasco Road Class II Landfill located in Livermore, California (see the following table).



Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

Soil Disposal Summary

Destination	Waste Classification	Volumes (tons)	
Kettleman Hills Landfill	PCB-TSCA (50 mg/kg & greater)	1,280.85	
Kettleman Hills Landfill	Non-RCRA (Lead)	1,977.83	
Vasco Road Landfill	Non-Hazardous (PCBs at less than 50 mg/kg)	5,102.04	
Keller Canyon Landfill	Construction Debris (includes building demolition debris)	2,476.60	

To ensure that the removal activities successfully met the cleanup goals, the 95% UCL of the mean of the cleanup confirmation soil sample data was calculated for each COC and compared with their respective cleanup goal. The results of this analysis indicated that concentrations of TPHmo and PCBs (up to 2.5 mg/kg) remained in soil at the Site at concentrations greater than the cleanup goals. The potential human health risks associated with residual concentrations of PCBs in soils is being mitigated by the installation of the TSCA cap.

2.3 Post-Mitigation Site Conditions

The completed Aspire Golden State College Preparatory Academy serves grades 6 through 12, with capacity for 570 students, and opened in August 2011. The school occupies approximately 1.4 acres and consists of:

- 3 two-story buildings (approximately 41,430 square feet total including 24 full-sized classrooms, 4 laboratories, 3 girls and 3 boys restrooms, and 4 staff restrooms);
- An asphalt-paved parking area with access via two driveways on 66th Avenue (one for ingress and one for egress);
- An asphalt-paved area for basketball; and
- Several planter areas.

The mitigation measures/engineering controls that comprise the cap systems are illustrated on Figure 3.



Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

3. Summary of Engineering Controls

The remedy described in the Revised PCB Cleanup Completion Report was the onsite containment of PCB-containing soil using engineering controls in the form of a cap placed over site soil to prevent or minimize exposures (ARCADIS 2014). The cap includes the placement of buildings or other barrier materials including, but not limited to, concrete, asphalt, clean fill, or landscaping. Hardscape and landscape engineering cap systems installed at the school site are summarized on Figure 3 and are described in Section 3.1 below.

Figure 3 is a site plan showing the mitigation measures/engineering controls that comprise the cap system.

3.1 Hardscape and Landscape Cap Designs

Hardscape and landscape cap systems, as identified in the letter from ARCADIS to EPA entitled "Proposed Toxic Substance Control Act (TSCA) Cap for Pavement Areas – Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California," dated April 25, 2011 (ARCADIS 2011a), and approved by the USEPA in a letter to CFC dated June 16, 2011 (USEPA 2011b), were emplaced across the school site and include: a two-story building, concrete and asphalt paved areas, and an asphalt parking lot. Hardscape cap systems consist of multiple layers of differing materials (i.e., imported base rock and asphalt or concrete).

In the landscaped and planter areas (see Figure 3), the native soil was covered by a minimum of 12 inches of clean fill over cement-treated native soil. The cement treated soil may contain low concentrations of PCBs. In accordance with a request from the USEPA, samples of the imported soil were collected and analyzed in accordance with a Soil Sampling Plan (ARCADIS 2011b). The results of these samples indicated that the imported soil met the requirements for imported soil (i.e., were below the cleanup criteria of 0.130, 80, and 7 mg/kg for PCBs, lead, and arsenic, respectively).

These areas will be properly maintained (i.e., inspected annually and replenished with additional clean fill, as necessary, to ensure that the cement-treated native soil that may contain low concentrations of PCBs is adequately covered). Soil to be used to replenish the planters will be commercially available top soil provided by a landscaping contractor as required. The key objectives to replenish the imported soils in the landscape and planter areas are to prevent disturbance of the cement-treated native



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soils and mixing of those native soils with existing clean soils and those clean soils that may be used to replenish the landscape and planter areas.

Annual inspections at the Site will include inspection of the landscape and planter areas to confirm that vegetable gardens are not being grown at the school site as part of any school curriculum that may end up being consumed by students or others at the school site.

4. O&M Inspections

4.1 Annual Inspections

Annual inspections of the cap will be conducted, and will be performed by the O&M Professional along with the O&M Coordinator. As described in Section 1.4.1, the O&M Professional is defined as a California-registered engineer or geologist with expertise in conducting soil investigation and remediation (e.g., an engineer or geologist who is familiar with the cap system installed at the school site). The O&M Coordinator will accompany the O&M Professional during the annual inspection.

The purpose of the annual inspection is to assess the condition of the cap and changes in site conditions or usage. The Annual Inspection Summary Report will describe any on-site construction activities or any other significant information related to the PCB engineering controls. If applicable the inspection will also review the completion of any repairs that were made to the cap. The inspection will include a visual inspection of the cap to identify and locate areas that require repair.

The key components of the inspection will include:

- 1. Identification of any cracks in the cap measuring greater than 0.25 inches wide and 3 inches long.
- 2. Identification of any areas of the cap requiring repairs.
- 3. Documentation of changes in site conditions or usage.
- 4. Description of any on-site construction activities. However, any construction activity is to be approved by the USEPA and County before the start of construction. Any such construction would be considered an alteration or modification to the cap.

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- A qualitative evaluation of the amounts of cover (soil) in the landscaped areas.
 Should additional soil be required in the landscaped areas, commercially available soil will be imported to the Site within 15 days of the discovery of the need for more soil.
- Complete Inspection Checklist for Engineering Control (Appendix A).

The annual inspections will be completed in July so that repairs (if required) can be completed prior to the beginning of the school year.

During inspections, items identified for required maintenance will have a specified action date for completion of the required repairs. The O&M Coordinator is responsible for follow-up review to ensure that identified repairs are completed on schedule, and will sign-off in the completion blocks of the inspection reports. The O&M Coordinator will notify representatives of CFC of any failures of the engineering controls that have not been repaired within 72 hours of discovery; such notifications will include a proposed schedule for completion of the required repairs and maintenance.

The Annual Inspection Summary Report will be prepared within 45 days after completion of each annual inspection, in accordance with the reporting requirements specified in Section 6.2 of this O&M Plan. The annual inspection reports will be submitted to the USEPA and the ACEH and maintained at the school site.

The O&M Professional and O&M Coordinator will be responsible for follow-up review to ensure that identified repairs are completed on schedule, and will sign-off in the completion blocks of the inspection reports.

4.2 Unplanned Events

School employees will contact the O&M Coordinator following unplanned events (e.g., fires, broken utility lines, floods and/or heavy rain, or seismic events) during which caps may be compromised and/or PCB-containing soils may be exposed. "Heavy" rain will be defined as rainfall exceeding 0.50 inches in one hour in Oakland, California. "Significant" seismic events will include those earthquakes occurring nearby, of a magnitude exceeding 5.0 on the Richter scale. The O&M Coordinator will document all inspections and required repairs or maintenance, and incorporate such documents into the Annual Inspection Summary Report.

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The O&M Professional and O&M Coordinator will notify the ACEH and USEPA of any failures (i.e., compromised integrity or possible breach in the cap) of the engineering controls resulting from unplanned events that are not repaired within 14 days of discovery; such notifications will include a proposed schedule for completion of the required repairs and maintenance.

The O&M Professional and O&M Coordinator will inspect the cap within 5 days following seismic activity greater than a 5.0 Richter scale magnitude earthquake. The findings of this inspection will be summarized in a letter that will be submitted to the ACEH and USEPA within 15 to 30 days after the inspection.

5. Intrusive Work Activities

Prior to conducting intrusive work activities on the cap, the O&M Professional and O&M Coordinator will provide a work plan presenting the scope of the activities to be conducted to the USEPA and ACEH. This work plan must be approved by USEPA and/or the ACEH prior to commencement of the intrusive work activities. These intrusive activities must be conducted in accordance with applicable provisions of this O&M Plan, the Land Use Covenant, and the SMP (Appendix B). Intrusive work includes any construction or maintenance activities that encounter soil beneath the cap regardless of the location of those soils (except soils that were demonstrated not to contain PCBs and other contaminants and were imported to the landscape and/or planter areas). These activities include but are not limited to: digging, drilling, excavating, grading, repairing, removing, trenching, filling, gardening, and other soil movement that may penetrate or otherwise compromise the caps in place, thereby opening pathways for possible human exposures to PCB.

Proposed modifications and disturbances to the cap must be conveyed to the ACEH and USEPA in the form of a work plan for review and approval prior to commencing with the work. These activities can result in modifications to the cap and the cap must be repaired consistent with agency-approved plans and design. The USPEA and ACEH will be notified of a proposed change to the surface cap at least two weeks prior to the scheduled work.

The following procedures are required when performing intrusive construction, repair, and/or maintenance activities to: (1) ensure that safeguards are in place to prevent or minimize PCB exposures to anyone at the school site; (2) prevent untrained or unauthorized personnel from performing intrusive work in PCB areas; and (3) restore the integrity of the in-place engineering controls if they are impaired or compromised by



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such activities. The O&M Coordinator will oversee these procedures for all PCB-intrusive work (as defined in Section 5 of this O&M Plan) performed by, or on behalf of, CFC at the school site:

- Provide information regarding the location of the cap systems, cross-section construction details, and locations of all soils containing PCB to selected contractors;
- Verify that selected contractors and their employees will comply with federal and state Occupational Safety and Health Administration requirements;
- Require that construction and maintenance work be performed in such a manner to meet or exceed the existing cap conditions;
- Evaluate timelines, school, and work schedules to ensure that PCB-intrusive work is completed as soon as possible to minimize exposure risks;
- Require reasonable restrictions to school site access to reduce exposures to nonworkers;
- Implement dust control practices that utilize water;
- Manage any PCB-containing or impacted soils brought to the surface in accordance with the SMP (see Appendix B), and in compliance with applicable, relevant, and appropriate provisions of state and federal law; and
- Comply with all applicable, relevant, and appropriate federal, state, and local requirements.

5.1 Standard Cap Repair

Intrusive construction or maintenance work activities will be conducted to meet or exceed the existing cap conditions (see Figure 3).

The procedures to be followed during intrusive work include the following:

- Stabilization of site;
- Limitation on site access, as appropriate;



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- Management of excavated soils, including dust control, work site access, and soil segregation;
- Cap repair, or fill replacement procedures, to match the existing cap conditions;
 and
- Evaluation and use of new fill materials.

6. Reporting and Record-Keeping

Reports concerning inspection, maintenance, and repair of the cap will be submitted to USEPA Region 9 and the ACEH. In addition, plans to modify the cap must be submitted to these agencies for approval before implementation.

6.1 Reporting Requirements

The O&M Coordinator will maintain records of training provided to O&M personnel, compile appropriate information, develop, and file the following reports at the school site in a timely manner:

- Annual Inspection Summary Reports
- Completion Reports for Intrusive work

6.2 Annual Inspection Summary Reports

Annual Inspection Summary Reports will summarize the findings from annual inspections, and will document completions, delays, or failures to repair any items identified as needing repairs. The Annual Inspection Summary Report will be signed by the O&M Professional and O&M Coordinator, and will be completed no later than 60 calendar days after the annual inspection has been conducted. Annual Inspection Summary Reports will follow the format outlined in Appendix C, and will be included and maintained in files at the school site.

Annual Inspection Summary Reports will include the following:

 Results of the annual visual inspection, including measurements and an evaluation of the conditions:



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- A description of actions taken since completion of the previous O&M annual inspection, including:
 - Any repairs to the installed cap remedy that were identified and carried out;
 - Any significant changes in site conditions or usage (e.g., paving, grading, utility trenching, playgrounds, or picnic areas); and
 - Any additional on-site construction or other significant information that may impact the installed cap remedy (e.g., installation of portable buildings or maintenance facilities);
- A description of any maintenance or repairs identified as needed during the O&M annual inspection;
- A description of any recommendations for O&M Plan modification;
- A description of actions planned or expected to be undertaken before the next
 O&M annual inspection that will impact the in-place engineering controls;
- Recommendations concerning any repairs to the installed caps that are still needed:
- Photographs depicting site conditions with brief identifying captions or descriptions.
 During the annual inspection, the O&M Professional will take photographs for documentation, as appropriate, to demonstrate stability and/or failure of engineering controls;
- Conclusions regarding the ongoing effectiveness of the cap systems; and
- Any additional PCB investigation must be reported to USEPA and County in a separate document and submitted 60 days after sample collection.

6.3 Completion Reports for Intrusive Work

Within 60 days of completion, intrusive work activities will be documented in a Completion Report prepared by the O&M Professional. Each Completion Report will include the following information:

Date work was performed;



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- Work location, with maps and figures;
- Work activities performed, including restoration of cap systems where necessary;
- Work practices taken to prevent potential exposures;
- Variance or modifications (if any) of the existing cap conditions; and
- Summary of finished site conditions.

The O&M Professional will incorporate all Completion Reports for PCB-intrusive work conducted during the year into the Annual Inspection Summary Report.

6.4 Record-Keeping and Retention

All documentation records (e.g., data, reports) prepared under this O&M Plan will be maintained by the O&M Coordinator at the school site. The records will include, but are not limited to:

- Periodic inspection checklists, Annual Inspection Summary Reports, Completion Reports for intrusive work, and photographs associated with all of the above;
- Records of public inquiries for information about PCB at the school site; and
- Investigation and mitigation documents (e.g., the Combined Environmental Mitigation Plan and Cap Completion Report).

All records will be preserved by the O&M Coordinator for a minimum of five years after the conclusion of each relevant activity.

Due to the significant volume of paper that could be generated, the O&M Coordinator may elect to maintain paper copies of reports from the most recent 12 months, and preserve the rest as electronic files.

7. Site Access

At all reasonable times and upon request, the O&M Coordinator will arrange for O&M personnel to have access to the school site. During intrusive activities, access to the work area will be limited by the placement of temporary fencing around the work area.



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8. O&M Plan Modifications

When long-term performance of the cap remedy has been confirmed, the O&M Coordinator may seek to modify the requirements of the O&M Plan based on site-specific monitoring results and/or conditions. The request to modify the O&M Plan will be submitted in writing to ACEH and USEPA in the form of a work plan for review. O&M Plan modifications may include the following:

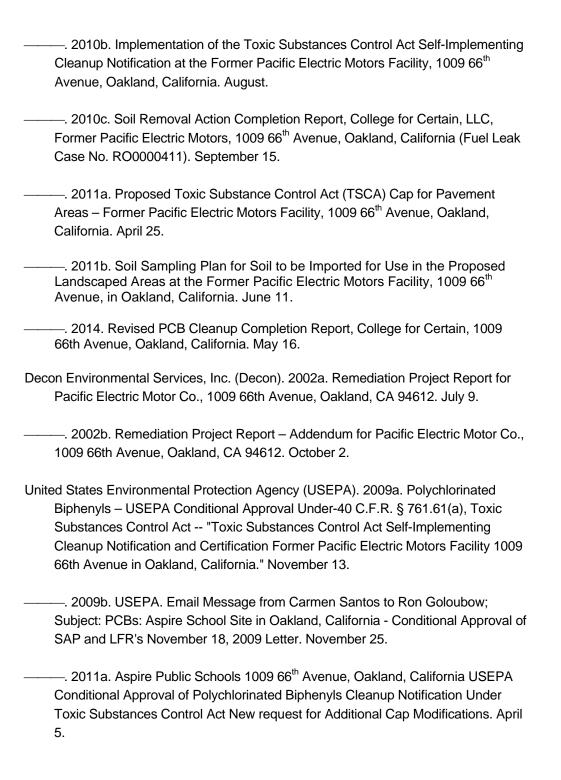
- Changes in the frequency of O&M activities;
- Modification, replacement, or addition of components to the O&M Plan if O&M activities fail to achieve the objectives of protecting public health, safety, and the environment; and/or
- Evaluation, design, construction, and/or operation of additional remedial measures to achieve the O&M objectives.

9. References

- Alameda County Environmental Health (ACEH). 2009. Final CAP Approval for Fuel Leak Case No. RO0000411 and GeoTracker Global ID T0600101950, Pacific Electric Motor, 1009 66th Avenue, Oakland, CA 94621. August 13.
- ARCADIS U.S., Inc. (ARCADIS). 2009a. Revised Corrective Action Plan, Proposed Aspire High School Site, 1009 66th Avenue, Oakland, California. July 17.
- 2009b. Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California. October 23.
- ——. 2009c. Conditional Approval of the Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification, Former Pacific Electric Motors Facility, 1009 66th Avenue in Oakland, California. November 18.
- ARCADIS. 2010a. Toxic Substance Control Act Risk-Based Cleanup Notification and Certification 40 CFR 761.61(c), Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California. January 14.

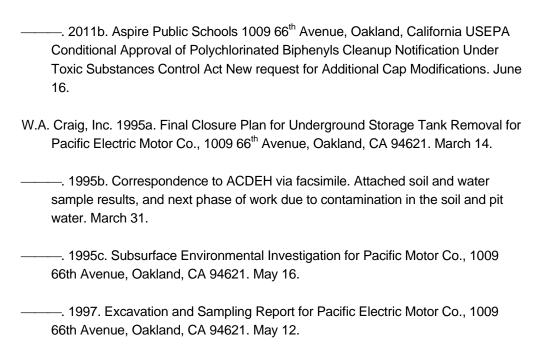
Operation and Maintenance Plan for Cap Mitigation Measures

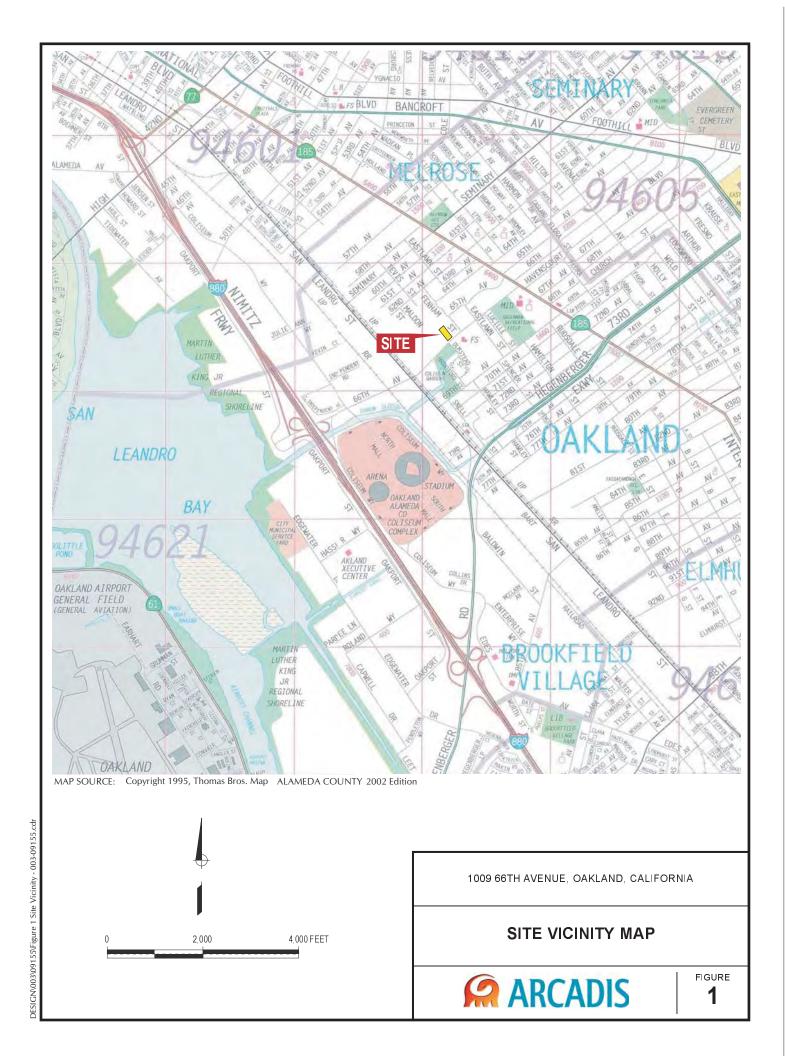
Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California



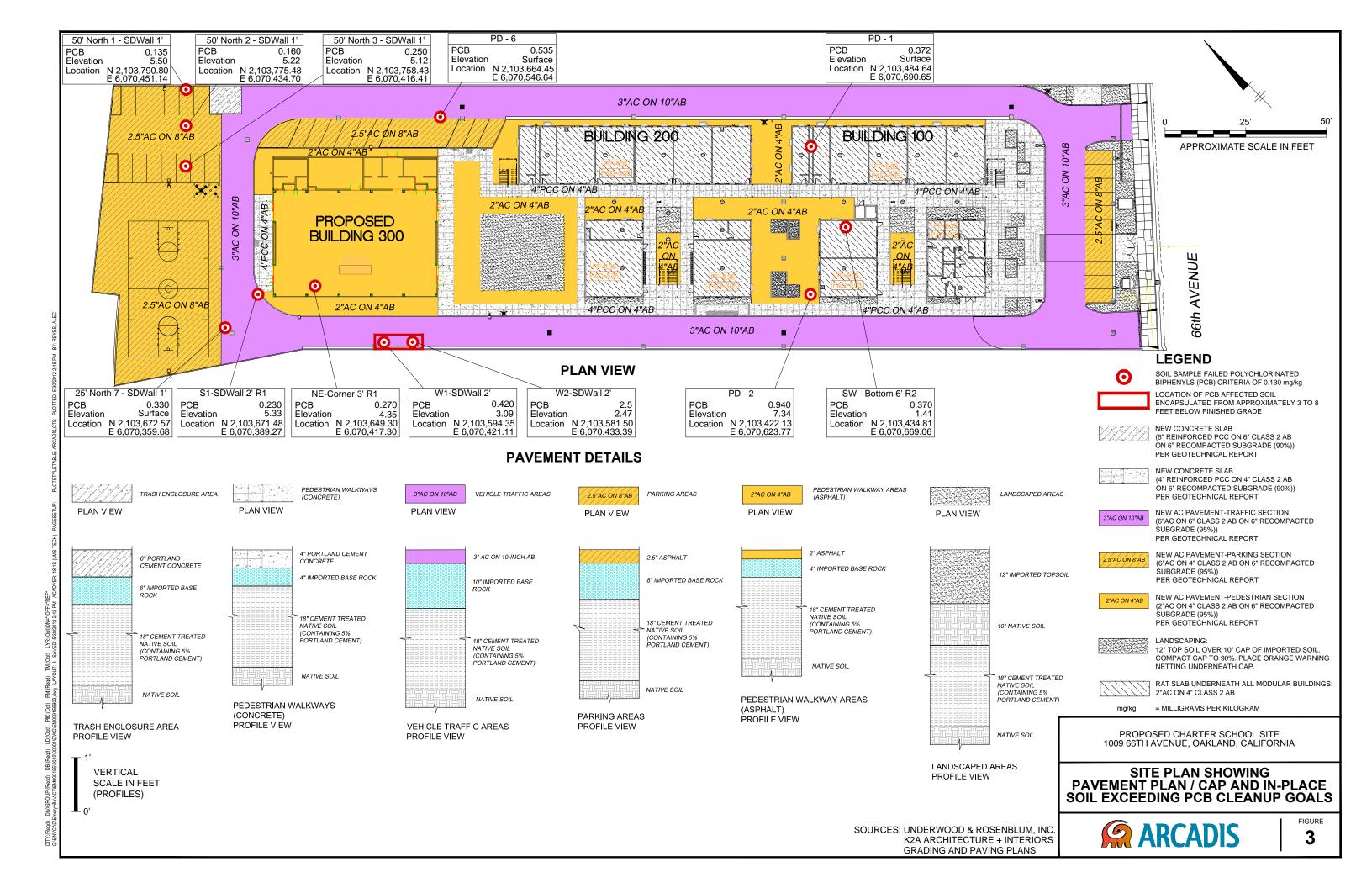
Operation and Maintenance Plan for Cap Mitigation Measures

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California





2





Appendix A

Inspection Checklist for Engineering Controls

INSPECTION CHECKLIST FOR CAP REMEDIES College For Certain Oakland, CA

Date			Inspector Nar	ne/Signature			
Inspection Frequency			Supervisor Name/Signature				
Area		Surface	Maintenance	Recommended Action Schedule			
	Alea	Condition OK?	Required	Plan		Implement	Completion
	Building Foundations	Yes □ No □	Yes □ No □				
Systems	Paved Parking and Vehicle Traffic Areas	Yes □ No □	Yes □ No □				
Hardscape Sys	Parking Ingress/Egress	Yes □ No □	Yes □ No □				
	Parking Area in the Rear of the Property	Yes □ No □	Yes □ No □				
	Interior Walkway Areas Around Buildings	Yes □ No □	Yes □ No □				
	Trash Enclosure	Yes □ No □	Yes □ No □				
Landscape Systems	Landscaped Areas near 66 th Avenue	Yes □ No □	Yes □ No □				
	Landscaped Areas Near Class Room Buildings	Yes □ No □	Yes □ No □				
	Landscaped Area Adjacent to Proposed Building 300	Yes □ No □	Yes □ No □				

Notes:

1. All areas are shown on Figure 2.

Building 300 (the gymnasium)

- 2. Inspection of the Hardscape Systems should ensure that concrete/asphalt pad and artificial material covers have not been disturbed or damaged in any way.
- 3. Inspection of the Landscape Systems should ensure that vegetation on the surface remains healthy; if applicable.



Appendix B

Soil Management Plan



Aspire Public Schools - College for Certain, LLC

Soil Management Plan

Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California (Fuel Leak Case Number RO0000411)

May 2014

Ron Goloubow, P.G. Principal Geologist

Soil Management Plan

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California (Fuel Leak Case Number RO0000411)

Prepared for:

Aspire Public Schools 1001 22nd Avenue Suite 100 Oakland, California 94606

Prepared by: ARCADIS U.S., Inc. 2000 Powell Street 7th Floor Emeryville California 94608 Tel 510.652.4500 Fax 510.652.4906

Our Ref.:

RV009155.0009

Date:

May 2014

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Certification

Date

All hydrogeologic and geologic information, conclusions, and recommendations in this document have been prepared under the supervision of and reviewed by an ARCADIS U.S., Inc., Professional Geologist.

Ron Goloubow, P.G. 8655

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Principal Geologist

California Professional Geologist (8655)



Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

1. Introduction

ARCADIS has prepared this Soil Management Plan (SMP) on behalf of Aspire Public Schools (Aspire) and College for Certain, LLC (CFC) for the former Pacific Electric Motors site located at 1009 66th Avenue in Oakland, California (the Site; Figures 1 and 2). The Site has been redeveloped into the Aspire Golden State College Preparatory Academy, which serves grades 6 through 12 and has capacity for 570 students; the school opened in August 2011. The school occupies approximately 1.4 acres and consists of:

- 3 two-story buildings (approximately 41,430 square feet total including 24 full-sized classrooms, 4 labs, 3 girls and 3 boys restrooms, and 4 staff restrooms);
- An asphalt-paved parking area with access via two driveways on 66th Avenue (one for ingress and one for egress);
- An asphalt-paved area for basketball; and
- Several planter areas.

This report is intended to comply with a request from the United States Environmental Protection Agency (USEPA) and Alameda County Environmental Health (ACEH) to prepare an SMP for the Site.

This SMP outlines sampling and health and safety procedures to be implemented during future site modification that could disturb site soil, such as the repair of a subsurface utility at the Site.

This SMP is intended to apply to any subsurface disturbance at the Site. The purpose of this SMP is to communicate the presence of chemicals identified in soil at the Site so that appropriate safety measures can be implemented to protect persons doing invasive site work and to appropriately manage soils at the Site. This SMP provides general protocols for the proper management of soil encountered and/or disturbed during excavation, construction, utility work, site redevelopment, and other work that may encounter impacted soil at the Site.

This SMP is not intended to replace federal, state, or local regulations or regulations addressing worker exposure including Federal and California Occupational Safety and Health Administration (OSHA) training and worker protection rules and regulations,

Soil Management Plan

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

Code of Federal Regulations (CFR) Title 29, Part 1910.120, or California Code of Regulations (CCR) Title 8, § 5192. It is the responsibility of the Property Owner to ensure that all workers, tenants, contractors, and subcontractors are made aware of the existing conditions, specifically the known presence and magnitude of chemicals so that the appropriate protective measures are implemented.

Issues not addressed in this document include construction and general OSHA worker safety requirements, including the Hazardous Waste Operations and Emergency Response Standard. Contractors who perform the site work are responsible for the health and safety of their own employees and must prepare a health and safety plan that is satisfactory to the owner, Aspire, prior to beginning work at the Site. All work at the Site must be completed in compliance with the federal, state, and local requirements not addressed in this document.

2. Project Overview

The site area is 2.51 acres and is located on the western side of 66th Avenue between East 14th Street (to the north) and San Leandro Street (to the south). The area around the Site is developed with a mixture of commercial, industrial, government, and multifamily residential buildings. The Site is bounded by a residential development to the north, Oakland Fire Department Station Number 2 to the east across 66th Avenue, Fruitvale Business Center to the south, and Northstar International Container Freight and Container Consolidation Services to the west.

The structures formerly associated with Pacific Electric Motors (and infrastructure) have all been demolished. The areas of affected soil have been removed in accordance with the Revised Corrective Action Plan, Proposed Aspire High School Site, 1009 66th Avenue, Oakland, California (Fuel Leak Case No. RO0000411; the CAP) submitted to the ACEH on July 17, 2009 (LFR 2009a). In addition, areas of polychlorinated-biphenyl (PCB)-containing soil were remediated in accordance with the CAP, the Self-Implementing Cleanup Plan (SICP) submitted to the USEPA on October 23, 2009 (LFR 2009b), the response letter from USEPA dated November 13, 2009 (USEPA 2009), and LFR Inc.'s (LFR's) response letters to EPA dated November 18, 2009 (LFR 2009c) and January 14, 2010 (LFR 2010). The configuration of the surface cap presented in Section 3 was presented in a letter to the USEPA by ARCADIS dated April 25, 2011 and the configuration of the cap was approved by USEPA in a letter dated June 16, 2011.



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A new school (the Golden State College Preparatory Academy) was developed on the property in 2010 as depicted on Figure 2. As part of the redevelopment of the Site, the ground surface comprised of roadways, sidewalks, parking areas, buildings, and planter areas is serving as a cap to mitigate the potential exposure to the affected soil at the Site.

3. Known or Potentially Chemical-Impacted Soil

Prior to redeveloping the Site, remedial tasks were conducted at the Site to remove soil containing elevated concentrations of lead, arsenic, PCBs, benzene, and total petroleum hydrocarbons as gasoline (see Figures 2, 3, and 4). The removal action for the PCB-containing soil was completed in accordance with the following:

 No. 40 CFR §761.61(a) 40 CFR 761.61 (c) of Toxic Substances Control Act (TSCA) regulations, EPA's conditional approval of the SICP, and EPA's amendments to its approvals.

Although the remedial actions were highly effective in removing the affected soil, the analytical results for 12 confirmation soil samples collected as part of the removal action for the PCB-containing soil indicated that PCBs were present at concentrations greater than the cleanup goal of 0.130 milligrams per kilogram (mg/kg) established for the Site (see the table below and Figure 3 and 4). Due to geotechnical work conducted to strengthen site soils for the redevelopment of the Site, the soil currently in those 12 locations was mixed during the cement treatment of the upper 18 inches of soil across the Site. Thus the PCB-containing soil may be at locations that are not represented by the samples collected in those locations before the geotechnical and grading work. Thus, the PCB concentrations detected in the 12 samples are no longer representative of the PCB concentrations at the Site due to mixing of the soils. The geotechnical work to strengthen the soil included the cement treatment of the upper 18 inches of soil across the Site. This may have resulted in the mixing/cement treatment of the soil at the 12 locations where PCBs were detected at concentrations greater than the cleanup goal.



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Sample ID	Depth below TSCA Cap - current ground surface (in feet)	PCBs (in mg/kg)
50' North 1 - SDWALL1'	1.0	0.135
50' North 2 - SDWALL1'	1.3	0.160
50' North 3 - SDWALL1'	1.4	0.250
25' North 7 - SDWALL1'	1.3	0.330
S1-SDWALL 2' R1	1.2	0.230
NE-CORNER 3' R1	2.2	0.270
W1-SDWALL 2'	3.4	0.420
W2-SDWALL 2'	4.0	2.500
SW-Bottom 6' R2	3.9	0.370
PD-1	1.3	0.372
PD-2	1.4	0.940
PD-6	1.2	0.535

Notes: The depth of the samples below the TSCA cap was established by subtracting the sample elevation from the finished floor elevation of the top of the TSCA cap.

To mitigate the human health risk posed by the affected soil, a surface cap was installed over the ground surface of the entire Site. The configuration of the cap summarized below was presented in a letter to the USEPA by ARCADIS dated April 25, 2011 and the configuration of the cap was approved by USEPA in a letter dated June 16, 2011.

• Trash Enclosure Area

- · Native soil
- 18 inches of cement-treated native soil
- · 6 inches of imported aggregate base rock
- 6 inches of Portland cement concrete (ground surface)

Pedestrian Walkway Areas – Concrete

- · Native soil
- 18 inches of cement-treated native soil
- · 4 inches of imported aggregate base rock
- 4 inches of Portland cement concrete (ground surface)



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Vehicle Traffic Areas

- Native soil
- 18 inches of cement-treated native soil
- 10 inches of imported aggregate base rock
- 3 inches of asphalt concrete (ground surface)

Parking Areas

- · Native soil
- 18 inches of cement-treated native soil
- 8 inches of imported aggregate base rock
- 2.5 inches of asphalt concrete (ground surface)

Pedestrian Walkway Areas – Asphalt

- Native soil
- 18 inches of cement-treated native soil
- · 4 inches of imported aggregate base rock
- 2 inches of asphalt concrete (ground surface)

Landscaped Areas

- · Native soil
- 18 inches of cement-treated native soil
- 10 inches of native soil
- 12 inches of imported top soil (ground surface)

4. Cleanup Goals Established for Soil

Risk-based cleanup goals were developed for the Site with an emphasis on health protection by incorporating conservative assumptions in the risk-based calculations. Cleanup goals were calculated by algebraically transforming the standard human health risk assessment equations to solve for a concentration given a target cancer risk of 1 x 10-6 or Hazard Index of 1.

Recommended cleanup goals resulting from this process are presented below:

Total Petroleum Hydrocarbons (TPH)

TPH as motor oil: 2,500 mg/kg

TPH as diesel: 180 mg/kg



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Metals

arsenic: 7 mg/kg (site-specific background level)

cadmium: 7.4 mg/kg
chromium: 750 mg/kg
cobalt: 80 mg/kg
copper: 230 mg/kg
lead: 80 mg/kg
zinc: 600 mg/kg

Organic Compounds

PCBs: 0.130 mg/kg

5. Soil Management During General Construction Activities

The following sections present the contingency protocols to be followed if unknown contamination is encountered during general site maintenance activities.

5.1 Potential Soil Disturbance Activities

Activities that may cause soil disturbance at the Site include: grading, grubbing, utility line repair-replacement, removal/excavation of soil, trenching, and performing other construction activities. If these or other subsurface activities are performed, this SMP will be followed.

5.2 Notifications

Prior to performing invasive activities, Aspire will notify USEPA and the ACEH a minimum of two weeks prior to conducting the proposed activities. A letter describing the scope of the work to be conducted will be provided to describe the nature of the invasive activities. The work will not begin until USEPA and the ACEH have provided approval of the scope of work. At the direction of Aspire, observation of the activities may be provided by ARCADIS. However, the USEPA and ACEH may conduct field oversight of these activities.



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5.2.1 Emergency Contacts

The persons indicated in the table below must be notified within 48 hours if subsurface disturbance is anticipated or if unexpected affected soil is encountered. Additionally, if soil is to be transported from the Site to an appropriate landfill, the following contacts must be notified.

Emergency Contacts

Contact	Telephone
Owner – Aspire Public Schools Contact: Tim Simon, Project Manager	510.434.5071 or 831.710.1865
Alameda County Environmental Health Contact: Jerry Wickham	510.567.6791
USEPA Contact Carmen Santos	415.972.3360 office
Environmental Consultant – ARCADIS Contact: Ron Goloubow	510.652.4500 office 510.501.1789 cell
Site Construction Manager Contact: *** to be designated before work begins***	*** to be designated before work begins***

If an emergency situation requiring medical attention, containment assistance, or other emergency assistance arises, workers should call 911 and follow emergency procedures provided in the Contractor's Health and Safety Plan.

5.3 Soil Screening

Prior to conducting intrusive activities at the Site, analytical data for soil samples collected in the area where the work is proposed to take place will be reviewed to assess disposal options. If analytical data for soil samples is not available within approximately 100 feet of the proposed work area, additional soil samples will be collected for the analysis of PCBs prior to commencing with the intrusive work. During intrusive activities, excavated soil will be visually inspected for evidence of impacts and/or screened using a photoionization detector as applicable. The following actions shall be taken for excavated soil:



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- Stockpile potentially impacted soil separately on plastic and in accordance with the SMP (see Section 5.4.2 below);
- Characterize the stockpiled soils as specified in Section 5.4.3, and dispose of stockpiled soil at an appropriately licensed facility (to be determined based on the analytical results of the samples collected from the stockpiled soil);
- Document and report the results of the soil samples to the USEPA and ACEH; and
- Replace the surface cap according to the description in Section 3.

Information relevant to each of these actions is described in more detail in the following sections.

5.4 Soil Management Strategy

Soil will be reused at the Site to the extent possible (only if soil does NOT contain contaminants of concern at concentrations greater than the cleanup criteria). Suspected contaminated soil (e.g., soil exhibiting discoloration, oily liquids, powders, or other substances, odors, or detections on field equipment) will be stockpiled and tested. This soil will only be reused if it meets the remedial goals discussed in Section 4.

5.4.1 Requirements for Imported Fill

Soil that is imported to the Site for use as fill must be sampled prior to being brought on site. A four-point composite sample should be collected for every 500 cubic yards of fill material imported to the Site and submitted for the following analyses:

- Volatile organic compounds by USEPA Method 8260B (solvent extraction EPA method 3540C)
- California Assessment Manual 17 metals by USEPA Method 6010B
- Semivolatile organic compounds by USEPA Method 8270
- PCBs by USEPA Method 8082A Soxhlet extraction, USEPA method 3540C

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- Organochlorine pesticides by USEPA Method 8081
- TPH by USEPA Method 8015M

The analytical results for each of the constituents should be less than the cleanup goals provided in Section 4 of the SMP or the final Environmental Screening Levels for shallow soil (less than 1 meter below ground surface) for commercial and industrial properties where the groundwater is not a potential source of drinking water (Table B-2, RWQCB 2013), with the exception of Arsenic. Arsenic concentrations should be less that the site-specific background concentration of 7 mg/kg (see discussion presented in Appendix B of the CAP).

5.4.2 Stockpile Management

Potentially impacted soil generated from construction activities will be stockpiled on site. The stockpiles will likely be located at the northern portions of the Site but will depend on the location of the work. The stockpiles will be placed on, and covered with, polyethylene sheeting (tarps) to provide separation and prevent off-site soil migration due to wind and water erosion. In addition, a berm made of hay bales or another accepted material will be placed around each stockpile to capture any potential runoff from the stockpile. No stockpiled soils will be removed from the Site without Aspire's written permission.

Dust control measures will be used during excavation/work activities such that no visible dust migration is observed. Typically, misting with water and the use of anchored tarps can be used to control dust emissions. Mitigation procedures to prevent wind erosion of an active stockpile will include applying sufficient water or other accepted material to keep the soil slightly damp, but not so much water to create runoff from oversaturation. Stockpiles will not be piled excessively high (less than approximately 20 feet above the ground surface) to further prevent airborne transport of stockpile material.

5.4.3 Soil Characterization and Off-Site Reuse/Disposal

Soils will be adequately sampled and characterized/profiled as presented below prior to disposal to an off-site and appropriately licensed facility. Prior to characterization, the receiving facility will be identified and acceptance criteria will be provided to Aspire and ARCADIS for review and approval. No soil samples will be collected and/or analyzed without prior written approval of Aspire.

Soil Management Plan

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

Sample collection and analyses will be required prior to transporting the soil off site for disposal or reusing the soil on site. The samples will be collected using the protocol described in the Soil Sampling Plan for imported soil for landscaping, dated June 24, 2011 (ARCADIS 2011). The proposed sampling will conform to the California Department of Toxic Substances Control (DTSC) Information Advisory – Clean Import Fill Material as follows:

- Up to 1,000 cubic yards one sample per 250 cubic yards
- 1,000 to 5,000 cubic yards four samples for the first 1,000 cubic yards plus one sample for each additional 500 cubic yards
- Greater than 5,000 cubic yards 12 samples for the first 5,000 cubic yards plus one sample for each additional 1,000 cubic yards

Soils for removal and off-haul can be profiled either in-place or from the stockpile. Subsequent to permission by Aspire, all soils removed from the Site for disposal will be disposed of at a disposal facility approved by Aspire and that meets the regulatory and permitting requirements to accept the waste. All soil transportation and disposal documentation must be forwarded to Aspire upon completion of the disposal activities. All documentation regarding soil removal and disposal must be submitted to USEPA within 14 days after disposal.

6. References

ARCADIS. 2011. Soil Sampling Plan for Soil to be Imported for Use in the Proposed Landscaped Areas at the Former Pacific Electric Motors Facility, 1009 66th Avenue, in Oakland, California. June 24.

Department of Toxic Substances Control (DTSC). 2001. Information Advisory - Clean Import Fill Material http://www.dtsc.ca.gov/Schools/upload/SMP_FS_Cleanfill-Schools.pdf. October.

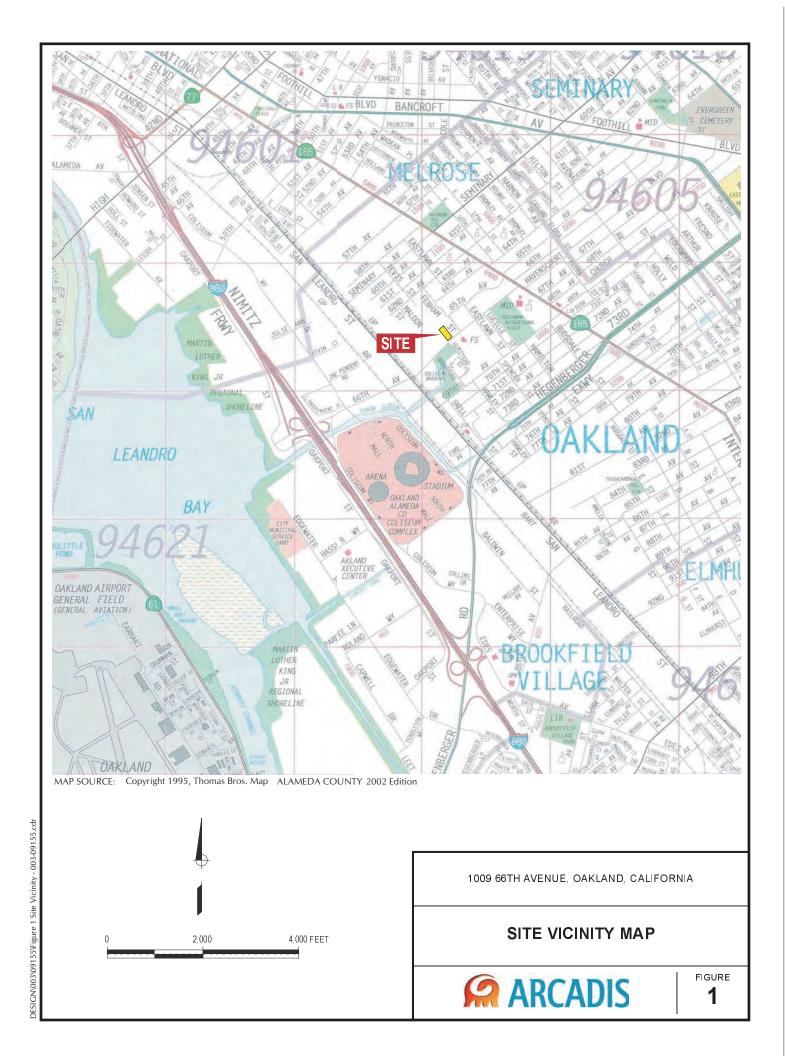
LFR Inc. (LFR). 2009a. Revised Corrective Action Plan, Proposed Aspire High School Site, 1009 66th Avenue, Oakland, California (Fuel Leak Case No. RO0000411) 1009 66th Avenue, Oakland, Alameda County, California. July 17.

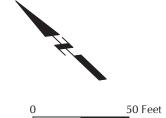
Soil Management Plan

Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California

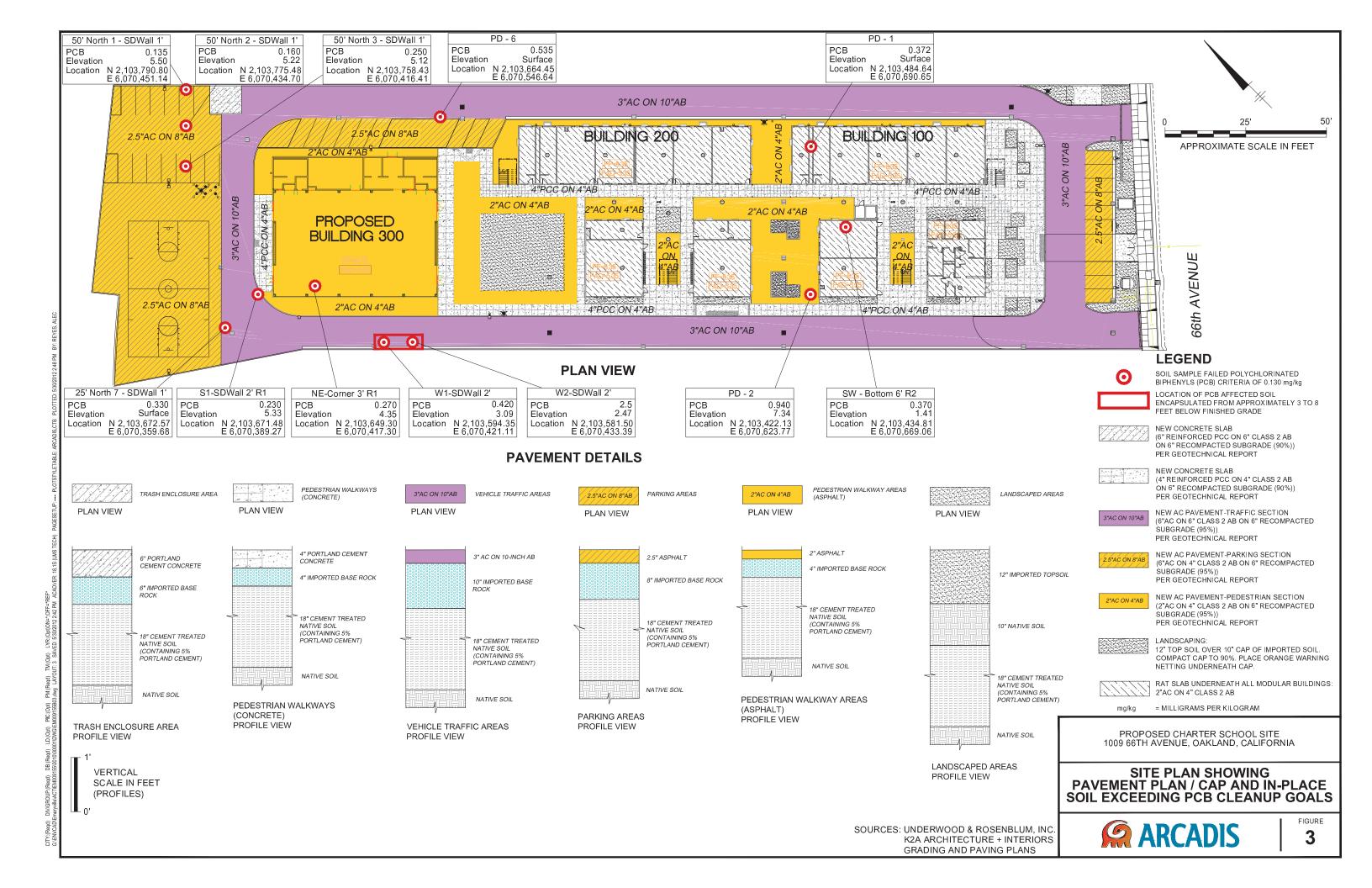
- LFR. 2009b. Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California. October 23.
- LFR. 2009c. Conditional Approval of the Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California. November 18.
- LFR. 2010. Toxic Substance Control Act Risk-Based Cleanup Notification and Certification 40 CFR 761.61(c), Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California. January 14.
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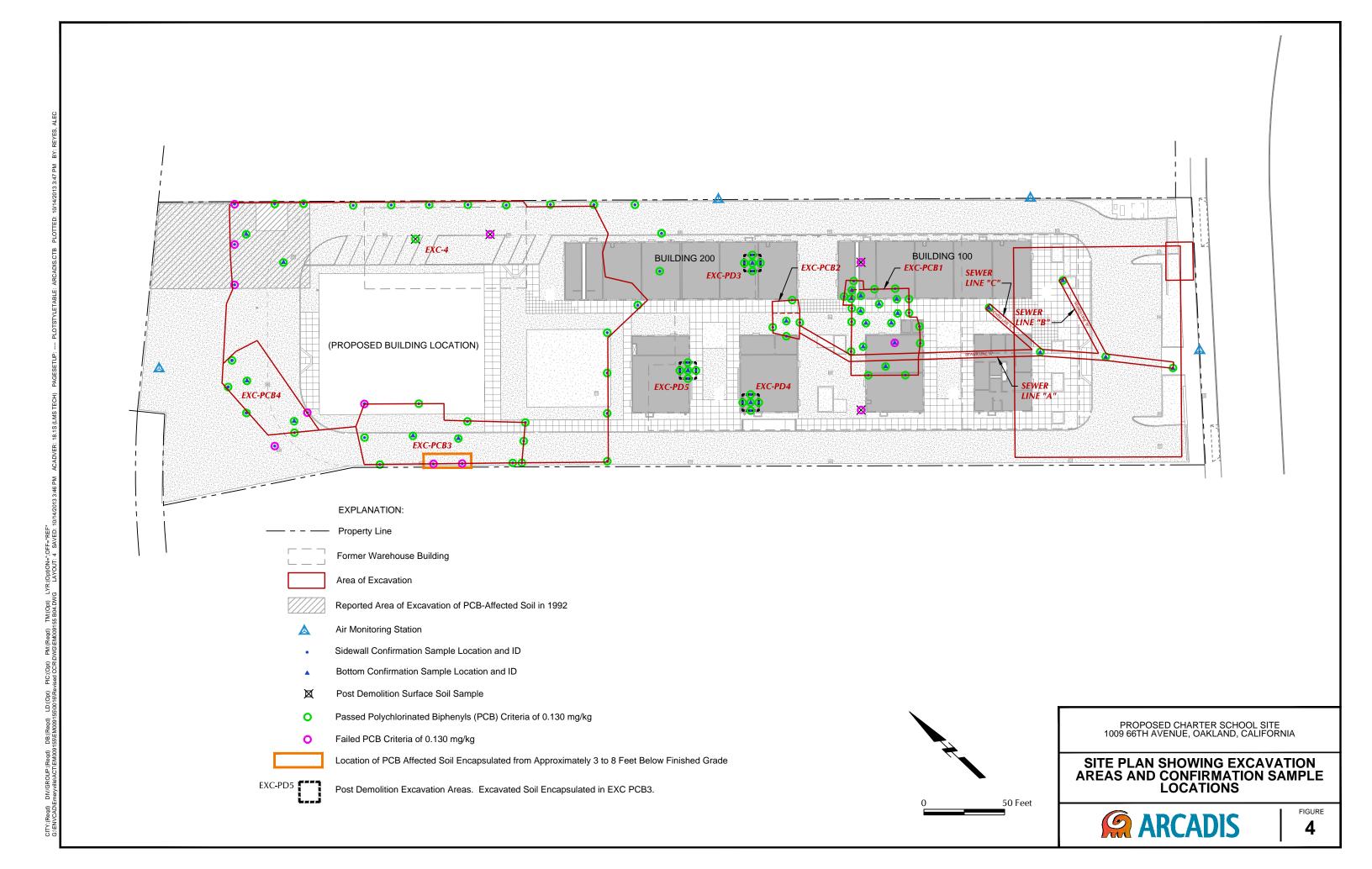
 Revised Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater. Revised. February.
- United States Environmental Protection Agency (USEPA). 2009. Polychlorinated Biphenyls USEPA Conditional Approval Under 40 C.F.R. § 761.61(a), Toxic Substance Control Act "Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California." November 13.













Appendix C

Annual Inspection Summary Report Outline

ANNUAL INSPECTION SUMMARY REPORT OUTLINE

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Attachments

1.0

- A Site Location Map
- B Site Plan Map
- E Intrusive Work Completion Reports (if applicable)
- F Annual Inspection Checklist and Field Notes
- G Photo Log: Include photographs depicting site conditions



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- F Annual Inspection Checklist and Field Notes
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Attachment 6

August 2010 TSCA Implementation Report



Ms. Carmen Santos U.S. Environmental Protection Agency, Region 9 Mail Code WST-5 75 Hawthorne Street San Francisco, California 94105 ARCADIS U.S., Inc. 1900 Powell Street 11th Floor Emeryville, CA 94608 Tel 510.652.4500 Fax 510.652.4906 www.arcadis-us.com

Environmental

Subject

Implementation of the Toxic Substances Control Act Self-Implementing Cleanup Notification at the Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California

Dear Ms. Santos:

On behalf of College for Certain, LLC (CFC), ARCADIS U.S., Inc. (ARCADIS) has prepared this summary report in accordance with §40 Code of Federal Regulations (CFR) §761.125(c)(5) to describe the implementation of the Toxic Substances Control Act (TSCA) Self-Implementing Cleanup Plan ("the SICP") at the Former Pacific Electric Motors (PEM) Facility located at 1009 66th Avenue in Oakland, California ("the Site"; Figures 1 and 2). The majority of the environmental work conducted was conducted by LFR Inc. (LFR), on behalf of CFC. LFR was purchased by ARCADIS in December 2008 and became fully integrated into ARCADIS in January 2010.

The scope of work for the SICP was presented in a letter from LFR to the U.S. Environmental Protection Agency (U.S. EPA), dated October 23, 2009 and prepared for Aspire Public Schools ("Aspire"; LFR 2009b). The SICP addressed the following polychlorinated biphenyl- (PCB-) related issues:

- The demolition of structures and associated infrastructure formerly located on the Site
- The collection and analysis of additional soil samples and samples of the building materials associated with the former warehouses that were demolished in January 2010.
- The remediation (excavation) of four areas of the Site where PCB-affected soil had been identified through soil samples collected at the Site

Date: August 12, 2010

Contact:

Ron Goloubow

Phone:

510.596.9550

E-mail:

ron.goloubow@arcadis-us.com

Our ref:

EM009155.0009.00002

The SICP received conditional approval from the U.S. EPA in its letter to Aspire dated November 13, 2009 ("Approval Letter"; U.S.EPA 2009). The conditions provided in the Approval Letter were addressed in a letter transmitted by LFR to the U.S. EPA, dated November 18, 2009. The scope of the SICP was further refined in an e-mail message from representatives of the U.S. EPA to LFR, dated November 25, 2009.

As discussed in conference calls and through the exchange of e-mail messages, the analytical results of confirmation soil samples collected at some locations at the Site during the SICP indicate that PCB-affected soil at concentrations greater than the cleanup criteria of 0.130 milligram per kilogram (mg/kg) is still present at the Site after the SICP was completed. The health risks associated with these "residual concentrations" are presented in Appendix A of this report, and the mitigation plan for this soil is presented in this report. In general, the mitigation measures will include installation of a "TSCA cap" across the surface of the Site and preparation of a deed notification. Both mitigation measures will be in accordance with 40 CFR 761.61(a)(7) and (8), respectively.

The areas of the Site where the excavation of PCB-affected took place are presented on Figure 3. The areas of excavation have been identified as follows:

- PCB-1 and PCB-2 both located near former catch basins (flat grate inlets) associated with the sewer system that was located inside the former warehouse area (Figure 4)
- PCB-EXC3 located near a topographic low area that received surface-water drainage in the northern portion of the Site (Figure 5)
- PCB-EXC4 located north of the topographic low area (PCB-EXC3; Figure 5)
- The northeastern portion of the Site where the excavation of PCB-affected soil previously took place in 1992 (Figure 5)

Excavation areas EXC-PCB1 and EXC-PCB2 are shown in detail on Figure 4; excavation areas EXC-PCB3, EXC-PCB4, and the excavation are located in the northeastern portion of the Site and presented on Figure 5. The scale of these figures accommodates the posting of the analytical results of the soil samples collected after the removal of the PCB-affected soil.

Scope of This Report

This report has been prepared in accordance with 40 CFR 761.125(c)(5) Records, "Requirements for PCB spill cleanup": This report also provides a summary of the procedures used for the demolition of the structures and site features that were removed during demolition activities along with the health risks associated with these "residual concentrations" (Appendix A), and the mitigation plan for this soil.

According to 40 CFR 761.125(c)(5), the responsible party shall document the cleanup with records of decontamination and the records must be maintained for a period of five years. The records and certification shall consist of the following:

(i) Identification of the source of the spill, e.g., type of equipment.

The source of the PCBs in soil at the Site has not been well documented. The source of PCBs in soil at the Site is most likely associated with the operations previously conducted at the Site by PEM. As previously reported, activities conducted at the Site by PEM included manufacturing of specialty magnets, power supplies, and components; and repairing motors, generators, and transformers (LFR 2009a). Documented releases of hazardous materials at the Site by PEM included PCBs; presumably from storing, repairing, and servicing transformers and other electrical equipment.

(ii) Estimated or actual date and time of the spill occurrence

The actual date and time of the spill occurrence(s) at the Site is not documented but is presumed to have taken place when PEM conducted operations at the Site between 1948 and 2001.

(iii) The date and time cleanup was completed or terminated (if cleanup was delayed by emergency or adverse weather: the nature and duration of the delay).

Cleanup activities conducted on behalf of CFC commenced on November 5, 2009 and were deemed completed on August 10, 2010. Significant weather delays were encountered in December 2009, and January, February, and March 2010.

(iv) A brief description of the spill location and the nature of the materials contaminated. This information should include whether the

spill occurred in an outdoor electrical substation, other restricted access location, or in a non-restricted access area.

The areas of PCB-affected soil at the Site that required remediation were identified as follows:

- EXC-PCB1 and EXC-PCB2 both located near former catch basins (flat grate inlets) that were associated with the sewer system located inside the former warehouse area (Figure 4)
- EXC-PCB3 located near a topographic low area that received surface-water runoff in the northern portion of the Site (Figure 5)
- EXC-PCB4 located north of the topographic low area (EXC-PCB3; Figure 5)
- The northeastern portion of the Site where the excavation of PCB-affected soil previously took place in 1992 (Figure 5)

Based on the available information regarding the source of the PCBs in soil at the Site, ARCADIS and CFC have assumed that the spill did not occur in an outdoor electrical substation or in a non-restricted access area. Since the releases occurred on private property, the areas of PCB-affected soil could be considered a "restricted access location."

(v) Pre-clean-up sampling data used to establish the spill boundaries if required because of insufficient visible traces and a brief description of the sampling methodology used to establish the spill boundaries.

Since there were "no visible traces" indicating a spill had occurred at the Site, the scope of the SICP was based on the analytical results of soil samples collected from across the Site as described below.

Soil Quality

Soil samples were collected from the Site through the course of several phases of environmental investigations that were conducted to assess soil quality at the Site from 1990 to 2009. As part of the SICP, the U.S. EPA requested the collection and analysis of soil samples from areas across the Site (see Approval Letter; U.S. EPA 2009).

The rationale for the collection of additional soil samples from selected locations across the Site prior to the excavation activities was based on previous site usage, as described in a letter from LFR to the U.S. EPA, dated October 19, 2009. In addition, if soil samples collected at these targeted locations contained elevated concentrations of PCBs, a "step-out" sample was collected approximately 10 feet from the original soil sample location. This work resulted in the collection of soil samples from approximately 47 locations at the Site.

In October 2009, LFR collected soil samples from 13 additional sample locations for a total of 60 locations. This sample distribution resulted in approximately one soil sample location for every 1,815 square feet of land across the Site. The analytical results for PCB analyses for these samples are presented on Figure 6. These data were used to derive the proposed areas of excavation, which are also illustrated on Figure 6.

Building Materials Survey

As requested by the U.S. EPA, samples of the building materials that comprised the two warehouses that were demolished were collected in October 2009. These samples were collected and analyzed in accordance with the Sampling Plan for Building Materials provided in the letter from LFR to the U.S. EPA, dated October 19, 2009.

Samples from building materials that included window caulk, paint, roofing materials, and concrete were collected and submitted to a state-certified laboratory for PCB analysis using U.S. EPA Test Method 8082. The laboratory reports for these samples are included on the compact disc (CD) that accompanies this report. PCBs were present in concentrations above the laboratory reporting limits in the samples collected from window caulk, paint, and concrete at the Site.

The demolition debris from the demolition of both structures, including but not limited to wood, metal, glass, and concrete, was consolidated on-site and transported for disposal as bulk PCB remediation waste at Republic Services' Keller Canyon Landfill located in Pittsburg, California.

Based on the weight tickets provided by Republic Services, a total of 1,060.52 tons of bulk PCB product waste (comprised of window calking and building materials) and PCB remediation waste (concrete affected by PCBs) was disposed of at the Keller Canyon Landfill. The majority of this material was concrete. The weight summary report for these materials is provided in Appendix B.

Post-Demolition Soil Samples

In accordance with the SICP, seven post-demolition surface soil samples were collected and analyzed from locations illustrated on Figure 6. PCBs were detected in these samples at concentrations ranging from 0.100 to 0.940 mg/kg. The laboratory reports for these samples are also included on the attached CD. These data were used as part of the data set for the health risk assessment that is provided in Appendix A. The potential health risks associated with the presence of this soil at the Site will be mitigated by the installation of the TSCA cap, thereby eliminating the potential exposure pathway to this soil.

Transformer and Air Compressor

A transformer and air compressor were located along the southern wall of the larger of the two former warehouses at the Site (Figure 2). These features were presumably used by PEM. Two samples, one from the oil contained in the transformer and the other from the oil in the air compressor, were collected and analyzed for PCBs using U.S. EPA Test Method 8082. PCBs were not present above laboratory reporting limits in either of these samples. The laboratory reports for these samples are also included on the attached CD.

Based on the above results, the oil from the transformer and air compressor were removed from the Site and recycled at the DeMenno/Kerdoon treatment, storage, and disposal facility (TSDF) located in Compton, California. The metal portions of the transformer and air compressor were removed from the Site as construction debris.

Sewer Line Removal

Following demolition of the larger former warehouse building and removal of the demolition debris, the sewer lines that serviced the former warehouse building at the Site were removed (Figure 3). In accordance with the SICP, the soil beneath the pipelines was over-excavated by approximately 1 to 2 feet below the former pipelines, and soil samples were collected approximately every 50 feet along the trench that formerly contained the sewer pipe.

A total of five soil samples were collected and submitted to a state-certified laboratory for PCB analysis using U.S. EPA Test Method 8082. As indicated on Figure 3, two confirmation soil samples collected from excavations EXC-PCB1 and EXC-PCB2 coincided with the locations of the former sewer pipelines. The locations of the former sewer pipelines and sample locations were surveyed for locations and

elevations by Tronoff Associates, Inc. (Tronoff), a licensed land surveying company located in West Sacramento, California.

PCBs were not present above analytical reporting limits in the seven soil samples collected from beneath the former pipelines. Five of the soil samples were collected from beneath the former pipeline and two soil samples were collected from excavations EXC-PCB1 and EXC-PCB2 that coincided with the locations of the former sewer pipelines.

Soil samples collected from soil previously excavated from this portion of the Site had contained concentrations of soluble lead in excess of the soluble threshold limit concentration (STLC). Thus, the soil that was excavated from around the former sewer pipelines and the pipelines were transported off-site as non-RCRA hazardous waste to Waste Management's Kettleman Hills Landfill.

(vi) A brief description of the solid surfaces cleaned.

Solid surfaces associated with the building materials associated with the former warehouse buildings were not cleaned prior to demolition. Solid surfaces of demolition and earth-moving equipment were cleaned in accordance with 40 CFR 761.79(c)(2) as required in Condition 3 of the Approval Letter. The buckets of the movable equipment and soil sampling equipment were swabbed with towels containing hexane. The decontamination materials were disposed of along with the PCB-affected soil that was transported to Waste Management's Kettleman Hills Landfill.

(vii) Approximate depth of soil excavation and the amount of soil removed.

This section provides a summary of the volume and disposition of the soil excavated from the four areas of PCB-affected soil. The locations and dimensions of the excavations, along with the locations and elevations of the confirmation soil samples, were surveyed by Tronoff. The survey data were the basis for the figures that are included in this report.

The excavated soil was transported and disposed of at off-site landfills as described below and in accordance with 40 CFR §761.61(a)(5) - Site Cleanup.

EXC-PCB1

This area of excavation was located adjacent to former catch basins (flat grate inlets) associated with the sewer system within the larger former warehouse building at the Site (Figures 3 and 4). The final depth of this area of excavation measured approximately 3 to 6 feet below grade.

One soil sample collected approximately 0.5 foot below ground surface (bgs) from soil boring 4B contained PCBs at 69.68 mg/kg. Based on the analytical results of this soil sample, soil excavated from this area of the Site was disposed of at Kettleman Hills. Based on weight tickets provided by Waste Management, 354.63 tons of PCB remediation waste soil were removed from this area of excavation on November 19 and 20, and December 10 and 11, 2009. The hazardous waste manifests and weight summary report provided by Waste Management are provided in Appendix B.

EXC-PCB2

This area of excavation was located adjacent to former catch basins (flat grate inlets) associated with the sewer system within the former warehouse buildings at the Site (Figures 3 and 4). The final depth of this area of excavation measured approximately 3 to 4 feet below grade.

Soil samples collected from soil borings in this area of excavation did not contain PCBs at concentrations greater than 50 mg/kg (Figure 6). Based on the analytical results for these soil samples, soil excavated from this area of the Site was disposed of at Republic Services' Vasco Road Landfill located in Livermore, California. Based on weight tickets provided by Republic Services, approximately 150 tons of PCB remediation waste soil were removed from this area of excavation in December 2009. The weight summary report provided by Republic Services is provided in Appendix B.

EXC-PCB3

This area of excavation was located near a topographic low area that received surface-water runoff in the northern portion of the Site (Figures 3 and 5). The final depth of this area of excavation measured approximately 3 to 8 feet below grade.

Soil samples collected from soil borings in this area of excavation did not contain PCBs at concentrations greater than 50 mg/kg (Figure 6). Based on the analytical results for these soil samples, soil excavated from this area of the Site was disposed

of at Republic Services' Vasco Road Landfill. Based on weight tickets provided by Republic Services, approximately 750 tons of PCB remediation waste soil were removed from this area of excavation in January 2010. The weight summary report provided by Republic Services is provided in Appendix B.

EXC-PCB4

This area of excavation was located north of the topographic low area (PCB-EXC3) (Figures 3 and 5). The final depth of this area of excavation measured approximately 3 to 6 feet below grade.

Soil samples collected from soil borings in this area of excavation did not contain PCBs at concentrations greater than 50 mg/kg (Figure 6). Based on the analytical results for these soil samples, soil excavated from this area of the Site was disposed of at Republic Services' Vasco Road Landfill. Based on weight tickets provided by Republic Services, approximately 600 tons of PCB remediation waste soil were removed from this area of excavation in January and March 2010. The weight summary report provided by Republic Services is provided in Appendix B.

The Former 1992 Excavation Area

This area of excavation was located in the northeastern portion of the Site where the excavation of PCB-affected soil previously took place in 1992 (Figure 5). The final depth of this area of excavation measured approximately 3 to 4 feet below grade.

Reportedly, soil samples collected in this area of excavation in 1992 contained PCBs at concentrations greater than 50 mg/kg. Thus, soil excavated from this area of the Site was disposed of at Kettleman Hills. Based on weight tickets provided by Waste Management, 501.37 tons of PCB-affected soil were removed from this area of excavation in December 2009 and March 2010. The hazardous waste manifests and weight summary report provided by Waste Management are provided in Appendix B.

(viii) Post-cleanup verification sampling data and, if not otherwise apparent from the documentation, a brief description of the sampling methodology and analytical technique used.

Post-cleanup verification soil samples were collected and analyzed in accordance with the methods and procedures provided in the SICP documents. Please note that, in areas where the analytical results of the confirmation soil samples failed the cleanup criteria (i.e., contained PCBs at a concentration greater than the cleanup

criteria), the area of excavation was expanded and additional confirmation soil samples were collected and analyzed. As discussed between representatives of the U.S. EPA, ARCADIS, CFC, and Alameda County Environmental Health (ACEH), concentrations of PCBs above the cleanup criteria remain in place at all but one of the following areas of excavation:

EXC-PCB1 – one sample location

EXC-PCB2 - no sample locations

EXC-PCB3 - three sample locations

EXC-PCB4 - one sample location

The Former 1992 PCB Excavation - three sample locations

Of these eight soil samples, only one sample collected from excavation area EXC-PCB3 along the property line adjacent to the neighboring warehouse contained PCBs at a concentration greater than 1.0 mg/kg. The Laboratory Certificates for the soil samples collected from these areas are provided on the attached CD. Please note that analytical results for some confirmation soil samples contained on the Laboratory Certificates are for soil samples that failed the cleanup criteria for PCBs and represent soil that was removed from the Site.

This report also contains the risk assessment associated with the unmitigated presence of the soil containing PCBs greater than the site-specific cleanup criteria of 0.130 mg/kg for future site occupants.

As discussed, the exposure pathway to this soil containing relatively low concentrations of PCBs for future occupants of this property will be mitigated. The mitigation measures will include the installation of a cap across the surface of the Site and the preparation of a deed notification. Both mitigation measures will be in accordance with 40 CFR 761.61(a)(7) and (8), respectively.

EXC-PCB1

A total of 25 confirmation soil samples were collected and analyzed from this area of excavation (see Table 1 and Figure 4). The analytical results for the samples collected from EXC-PCB1 are summarized in Table 1. Only one soil sample collected from the base of the excavation, approximately 8 feet bgs, contained PCBs at a

concentration of 0.370 mg/kg. Since this soil sample was collected approximately 4 feet below groundwater, the excavation was not expanded.

EXC-PCB2

A total of five confirmation soil samples were collected and analyzed from this area of excavation that passed the cleanup criteria for PCBs (Table 2 and Figure 4). None of the soil samples collected from this area contained PCBs above the cleanup criteria. The analytical results for the samples collected from EXC-PCB2 are summarized in Table 2.

EXC-PCB3

A total of nine confirmation soil samples were collected and analyzed from this area of excavation that passed the cleanup criteria for PCBs (Table 3 and Figure 5). The analytical results for the samples collected from EXC-PCB3 are summarized in Table 3. A total of three soil samples collected from this area contained PCBs above the cleanup criteria. Two of the soil samples that failed the cleanup criteria were collected from along the property boundary adjacent to the large warehouse that is located on the adjacent property (Figure 5). As discussed, this area could not be excavated past 4 feet bgs due to the presence of the adjacent building; therefore, the soil had to be left in place.

EXC-PCB4

A total of seven confirmation soil samples were collected and analyzed from this area of excavation that passed the cleanup criteria for PCBs (Table 4 and Figure 5). The analytical results for the samples collected from EXC-PCB4 are summarized in Table 4. Only one soil sample collected from this area contained PCBs above the cleanup criteria.

The Former 1992 Excavation Area

A total of seven confirmation soil samples were collected and analyzed from this area of excavation that passed the cleanup criteria for PCBs (Table 5 and Figure 5). The analytical results for the samples collected from the excavation near the Former 1992 Excavation Area are summarized in Table 5. Three soil samples collected from this area contained PCBs above the cleanup criteria.

(ix) While not required for compliance with this policy, information on the estimated cost of cleanup (by man-hours, dollars, or both) would be useful if maintained in the records

CFC has spent approximately \$500,000 remediating the PCB-affected soil and concrete at this Site to date.

Summary of Human Health Risk Evaluation

This section provides a summary of the Human Health Risk Evaluation conducted for this Site. The recent Human Health Risk Evaluation that takes into account the data from the SICP is provided in Appendix A.

In 2006, LFR performed a baseline risk evaluation using the assumptions of residential exposure, as designated in the Preliminary Environmental Assessment Guidance Manual (DTSC 1999). A detailed description of the methods and procedures of this risk evaluation was presented in the Draft Final Soil Removal Action Work Plan (LFR 2006).

The total excess cancer risk posed by the presence of chemicals in soil was calculated to be 9 x 10⁻³ (LFR 2006). The majority of this total risk is attributable to the presence of arsenic, hexavalent chromium (chromium (VI)), benzene, polycyclic aromatic hydrocarbons (PAHs), and PCBs at the Site. The total hazard index (HI) for the property was calculated to be 128. The majority of the total non-cancerous hazard is attributable to PCBs. Other chemicals that contribute to the non-cancerous hazard include arsenic and vanadium.

Compounds were selected for cleanup goal development if they were identified in the risk assessment as having a greater than one in one million risk or a hazard quotient greater than 1. The cleanup goal development methodology was presented in the revised CAP (LFR 2009a).

In-Place Soil Evaluation

A human health risk screen was performed considering the soil that was left in place after the removal actions. This included analytical data for soil samples collected during the site characterization activities and post-removal confirmation soil sampling events. Data associated with soil that was removed from the Site (i.e. excavated, transported, and disposed of off-site) were removed from the data set. Therefore, the data set consists of only data associated with soils remaining on-site. A list of the

PCB in-place soil samples used for this evaluation is presented in Table A-1, included in Appendix A.

Exposure point concentrations (EPCs) of the post-removal chemicals of concern (COCS) were used to perform the human health risk screen. The EPCs for the selected COCs were compared to Recommended Cleanup Goals presented in the revised CAP (LFR 2009). The U.S. EPA software ProUCL Version 4.00.05 was used to perform the statistical evaluation. EPCs were calculated for COCs with a minimum of six detections. Maximum detected concentrations were used for COCs with fewer than six detections.

Details on the statistical evaluation and representative concentrations are included in Appendix A.

Health Risk Screen

Comparisons were performed as follows for carcinogenic compounds:

 $Riskepc = \frac{EPCsoil \times TRisk}{CUG}$

Where:

RiskEPC = estimated risk for COC (target = 10-6) EPCsoil = exposure point concentration for soil TRisk = target risk used for the CUP calculation (10-6) CUP = cleanup goal presented for the COCs in CAP

Comparisons were performed as follows for non-carcinogenic compounds:

HazardEPC = EPCsoil CUG

Where:

HazardEPC = estimated risk for Site (target = 1)

EPCsoil = exposure point concentration for soil

CUP = cleanup goal presented for the COCs in CAP

The estimated risk based on the screen is 2×10^{-6} . PCBs are the only in-place COCs with an estimated risk greater than 1×10^{-6} . The estimated HI is 4. PCBs are the only in-place COCs with an estimated HI greater than 1.

The metals arsenic and lead were evaluated by comparing their respective EPCs to the established cleanup goals. Arsenic's goal is based on naturally occurring background concentrations, and lead is based on the residential California Human Health Screening Level (OEHHA 2009). Both arsenic and lead EPCs were below their respective screening criteria.

Mitigation Measures

This section of the letter provides a summary of the mitigation measures to be implemented at the Site.

TSCA Cap

As we have discussed, the PCB-affected soil will be mitigated by installing a "TSCA cap" across the Site. Figure 7 is a map that illustrates the locations of the soil samples that failed the cleanup criteria for PCBs with respect to the proposed redevelopment plan for the property. The mitigation measures, including a soil management plan (SMP) and installation of the TSCA cap, have been incorporated into the grading plan for the redevelopment of this property.

The grading plan is provided as Appendix C to this report. As indicated on Figure 7, the majority of the property will be covered by pavement or buildings. There are some smaller areas proposed of landscaping. In accordance with 40 CFR 761.61(a)(7), the following specifications have been proposed for the installation of the cap at the Site:

- Asphalt areas that are subject to traffic 6-inch-thick section of asphalt placed over a 6-inch-thick interval of imported and compacted aggregate base rock
- Asphalt areas that are subject to parking 6-inch-thick section of asphalt placed over a 4-inch-thick interval of imported and compacted aggregate base rock
- Concrete slab that is for the multipurpose building 6-inch-thick section of concrete placed over a 2-inch-thick interval of imported and compacted aggregate base rock

- Rat slabs beneath the modular buildings will be a 6-inch-thick section of asphalt
- Landscaped areas will be comprised of 12 inches of imported top soil placed on top of 10 inches of imported soil compacted to 90% relative compaction. In addition, a layer of orange plastic safety netting will be placed upon the native soil at the landscaped areas to demark the presence of native soil.

The locations of the various areas at the Site are provided on sheet 1-C3.0 of the grading plan (Appendix C).

TSCA Cap Inspection

The TSCA cap will be visually inspected annually (once a year) for cracks or differential settlement. The inspection will be conducted by a California licensed Engineer or Geologist. The results of the inspection will be documented in a brief summary letter that will include photographs and a map. The letters will be transmitted to the U.S. EPA for its review and comment.

All identified cracks or settlements will be repaired by a California-licensed General Engineering Contractor to provide equipment and experienced personnel to conduct the excavation work. The personnel will have the appropriate Occupational Safety and Health Administration (OSHA) training for sites with affected soil and groundwater (HAZWOPER). Repair activities will be directed by individuals working under the direct supervision of a California Professional Geologist or Professional Engineer. Soil generated through the repair activities will be handled in accordance with the SMP that is included in the grading plan for this project. The repairs will be documented in a brief summary letter that will include photographs and a map.

Soil Management Plan

An SMP has been developed for the Site and is incorporated into the grading plan (Appendix C). In general, the SMP provides a summary of procedures to be used if soil is to be disturbed at the Site. This includes the grading operations that are to take place during the re-development of the Site.

Deed Notice and Risk Management Plan

As provided in the Approval Letter, CFC shall record in accordance with California state law, a notation on the deed to the property, or on some other instrument that is

normally examined during a title search, that will in perpetuity notify any potential purchaser of the property of the following:

- That the land has been used for PCB remediation waste disposal and specific activities are prohibited as described in the risk management plan described above;
- (2) Existence of the cap (protective barriers) and the requirement to maintain the protective barriers in perpetuity;
- (3) The applicable cleanup levels left at the Site, under the cap; and
- (4) The procedure by which the U.S. EPA will be notified of penetrations or alterations of the required cap. In addition, CFC will submit to the U.S. EPA a certification signed by an officer of CFC certifying the required deed was recorded.

One other condition of the Approval Letter was for CFC to provide an SMP. The SMP will include the following:

- (1) A survey of the Aspire property and map clearly depicting all areas where PCBs were encountered and remediated;
- (2) A description of specific activities to be prohibited at the school because of their potential to penetrate protective barriers (e.g., asphalt, concrete) that would expose on-site soils;
- (3) A description of how the teachers, administrators, and staff at the school will be notified of the specific activities that are prohibited at the school because of their potential to penetrate protective barriers (e.g., asphalt, concrete) that would expose on-site soils; and
- (4) The conditions under which penetration or alteration of protective barriers is permitted and the contingencies that must be implemented to prevent exposure to on-site soils.

The deed notification and SMP are currently being prepared and will be provided to the U.S. EPA under a separate submittal.

We at ARCADIS appreciate working with you and your team and look forward to bringing this project to closure with the U.S. EPA and ACEH in the very near future.

Sincerely,

ARCADIS U.S., Inc.

Ron Goloubow, P.G. Senior Associate Geologist

Copies:

Mike Barr – College for Certain, LLC Charles Robitaille – Pacific Charter Schools Paresh Khatri – Alameda County Department of Environmental Health

Enclosures:

Compact Disc - Containing Laboratory Reports for Soil Samples

Table 1 – Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-1, PCBs

Table 2 - Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-2, PCBs

Table 3 - Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-3, PCBs

Table 4 – Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-4, PCBs

Table 5 - Analytical Results for Confirmation Soil Samples Collected from EXC-4, PCBs

Figure 1 – Site Vicinity Map

Figure 2 - Site Plan

Figure 3 – Site Plan Showing Excavation Areas and Confirmation Sample Locations

Figure 4 – Excavations PCB-1 and PCB-2

Figure 5 – Excavations EXC-4, PCB-3, and PCB-4

Figure 6 – PCBs Detected in Soil 0 to 5 feet Below Ground Surface

Figure 7 – Proposed Development Plan with Excavation Areas and Confirmation Sample Locations

Appendix A – Human Health Risk Evaluation

Appendix B - Hazardous Waste Manifests and Weight Summary Reports from Waste

Management and Republic Services

Appendix C - Grading Plan

References

- California Environmental Protection Agency, Department of Toxic Substances Control (DTSC). 1999. Preliminary Environmental Assessment Guidance Manual. June.
- California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA). 2004. Guidance for School Site Risk Assessment Pursuant to Health and Safety Code Section 901(f): Guidance for Assessing Exposures and Health Risks at Existing and Proposed School Sites. Final Report. February.
- Department of Toxic Substances Control (DTSC). 1996. Supplemental Guidance for Human Health Multimedia Risk Assessments of Hazardous Waste Sites and Permitted Facilities Manual. July.
- LFR Inc. (LFR). 2006. Draft Final Soil Removal Action Work Plan, Proposed Aspire Charter School, 1009 66th Avenue, Oakland, Alameda County, California. October 10.
- 2009a. Revised Corrective Action Plan, Proposed Aspire School Site, 1009 66th Avenue, Oakland, California (Fuel Leak Case No. RO0000411). July 17.
- ——. 2009b. Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California. October 23.
- ——. 2009c. Conditional Approval of the Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification, Former Pacific Electric Motors Facility, 1009 66th Avenue in Oakland, California. November 18.
- U.S. Environmental Protection Agency (U.S. EPA). 1989. Risk Assessment Guidance for Superfund, Human Health Evaluation Manual, Part A. Interim Final. December 29.

Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-1, PCBs

Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California

concentrations in milligrams per kilogram (mg/kg)

PCB Excavation 1

Sample ID	Date	PCBs
EXC-PCB-1 W-SIDEWALL 2' NORTH 2	11/10/2009	<0.050
EXC-PCB-1 N-SIDEWALL 2' WEST 2	11/10/2009	0.069
EXC-PCB-1 S-SIDEWALL 2' EAST	11/4/2009	<0.050
EXC-PCB-1 S-SIDEWALL 2' WEST	11/4/2009	<0.050
EXC-PCB-1 N-SIDEWALL 2' WEST	11/6/2009	<0.050
EXC-PCB1 N-SDWALL-2'-EAST2	11/11/2009	<0.050
EXC-PCB-1 E-SIDEWALL 2' NORTH	11/6/2009	<0.050
EXC-PCB-1 E-SIDEWALL 2' SOUTH	11/6/2009	<0.050
EXC-PCB1 E-SDWALL-2'-NORTH2	11/11/2009	<0.050
EXC-PCB-1 NW2 BOTTOM 4'	11/10/2009	<0.050
EXC PCB1-NW-BOTTOM4'-R2	11/23/2009	<0.050
EXC-PCB-1 NE BOTTOM 4'	11/6/2009	<0.050
EXC-PCB1E-NE2-BOTTOM 4'	11/11/2009	<0.050
EXC-PCB1E-NE3-BOTTOM 4'	11/11/2009	<0.050
EXC-PCB-1 CENTER BOTTOM 4'	11/6/2009	0.074
EXC-PCB-1 SW BOTTOM 4'	11/6/2009	0.058
EXC-PCB-1 SE BOTTOM 4'	11/6/2009	<0.050
EXC TPH/PCB1-SW-BOTTOM8'-R3	12/3/2009	0.370
EXC TPH/PCB1 SE-BOTTOM 4'-R	11/17/2009	<0.050
EXC TPH/PCB1 NW-BOTTOM 4'	11/17/2009	<0.050
EXC TPH/PCB1W-BOTTOM4'-R	11/24/2009	<0.050
EXC TPH/PCB1 S-SDWALL2'-EAST-R	11/18/2009	<0.050
EXC TPH/PCB1 N-SDWALL2'-WEST-R	11/21/2009	<0.049
EXC TPH/PCB1 S-SDWALL2'-WEST-R	11/18/2009	<0.050
EXC TPH/PCB1 W-SDWALL2'-SOUTH-R2	11/24/2009	<0.050
EXC TPH/PCB1W-SDWALL2'-NORTH-R	<0.050	
REGULATORY CONCENTRATION		
Soil Cleanup Goal		0.130

Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-1, PCBs Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California

concentrations in milligrams per kilogram (mg/kg)

Notes:

PCBs = polychlorinated biphenyls

Samples analyzed by TestAmerica Laboratories Inc. for PCBs using EPA Test Method 8082.

Bold font denotes results above soil cleanup goal.

Italic font denotes results of sample collected at the location of "over-excavation" where analytical results were above cleanup goals.

Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-2, PCBs Former Pacific Electric Motors Site

1009 66th Avenue, Oakland, California

concentrations in milligrams per kilogram (mg/kg)

PCB Excavation 2

Sample ID	Date	PCBs		
EXC-PCB-2 W-SIDEWALL 2'	11/4/2009	<0.050		
EXC-PCB-2 E2-SIDEWALL 2'	11/10/2009	<0.050		
EXC-PCB-2 SO-SIDEWALL 2'	11/4/2009	< 0.050		
EXC-PCB-2 N-SIDEWALL 2'	11/4/2009	<0.050		
EXC-PCB-2 CENTER BOTTOM 4'	11/5/2009	<0.050		
REGULATORY CONCENTRATIONS				
Soil Cleanup Goal		0.130		

Notes:

PCBs = polychlorinated biphenyls

Samples analyzed by TestAmerica Laboratories Inc. for PCBs using EPA Test Method 8082.

Italic font denotes results of sample collected at the location of "over-excavation" where analytical results were above cleanup goals.

Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-3, PCBs

Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California

concentrations in milligrams per kilogram (mg/kg)

PCB Excavation 3

. OD EXCUTATION O			
Sample ID	Date	PCBs	
EXC PCB3 N-BOTTOM4'	11/21/2009	<0.050	
EXC PCB3 S-BOTTOM4'	11/21/2009	<0.050	
EXC PCB3-SE-CORNER4'	11/23/2009	<0.049	
EXC PCB3-NE-CORNER3'R1	12/8/2009	0.270	
EXC PCB3-E1-SDWALL2'R1	12/8/2009	<0.050	
EXC PCB3-E2-SDWALL2'	11/23/2009	<0.050	
EXC PCB3-NW-Corner 4'	5/26/2010	0.047	
EXC PCB3-SW-CORNER4'	11/23/2009	<0.050	
EXC PCB3-W1-SDWALL4'	5/26/2010	0.420	
EXC PCB3-W2-SDWALL4'	5/26/2010	2.500	
EXC PCB3-W3-SDWALL2'	11/23/2009	<0.050	
EXC PCB3-N-SDWALL2'R1	12/8/2009	<0.050	
REGULATORY CONCENTRATIONS			
Soil Cleanup Goal 0.			

Notes:

Samples analyzed by TestAmerica Laboratories Inc. for PCBs using EPA Test Method 8082. Bold font denotes results above soil cleanup goal.

Italic font denotes results of sample collected at the location of "over-excavation" where analytical results were above cleanup goals.

PCBs = polychlorinated biphenyls

Analytical Results for Confirmation Soil Samples Collected from EXC-PCB-4, PCBs

Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California

concentrations in milligrams per kilogram (mg/kg)

PCB Excavation 4

Sample ID	Date	PCBs	
EXC PCB4-N-SDWALL2'	11/21/2009	0.084	
EXC-PCB4-N2-SDWALL2'	11/21/2009	<0.050	
EXC-PCB4-S2-SDWALL2'	11/21/2009	0.200	
EXC PCB4-W-SDWALL2'R1	12/8/2009	0.066	
EXC PCB4-E-SDWALL2'	11/21/2009	0.120	
EXC-PCB4-W-BOTTOM6' R1	12/8/2009	<0.049	
EXC-PCB4-E-BOTTOM4'	11/21/2009	<0.049	
REGULATORY CONCENTRATIONS			
Soil Cleanup Goal	0.130		

Notes:

Samples analyzed by TestAmerica Laboratories Inc. for PCBs using EPA Test Method 8082.

Bold font denotes results above soil cleanup goal.

Italic font denotes results of sample collected at the location of "over-excavation" where analytical results were above cleanup goals.

PCBs = polychlorinated biphenyls

Analytical Results for Confirmation Soil Samples Collected from EXC-4, PCBs

Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California

concentrations in milligrams per kilogram (mg/kg)

Excavation 4

Sample ID	Date	PCBs
EXC4-N1-SDWALL3'-R2	06/04/10	0.029
EXC4-NORTH3-SDWALL1'	11/20/09	<0.050
EXC4-NORTH4-SDWALL1'	11/20/09	<0.050
EXC4-NORTH5-SDWALL1'	11/20/09	<0.050
EXC4-NORTH6-SDWALL1'	11/20/09	<0.050
EXC4-25'NORTH1-SDWALL3' R1	06/04/10	0.015
EXC4-25'NORTH4-SDWALL1'	11/30/09	0.067
EXC4-25'NORTH5-SDWALL1'	11/30/09	<0.050
EXC4-25'NORTH6-SDWALL1'	11/30/09	<0.050
EXC4-50'NORTH1-SDWALL3'-R2	06/04/10	0.135
EXC4-50'NORTH3-SDWALL1'	11/30/09	0.250
EXC4-50'NORTH3-SDWALL3'-R2	06/04/10	0.029
EXC4-50'NORTH3-SDWALL1'-R	11/30/09	0.250
EXC4 NORTH 50 BOTTOM 3' NORTH	07/02/10	0.099
EXC4 NORTH 50 BOTTOM 3' SOUTH	07/02/10	0.064
EXC4-SOUTH2-SDWALL1'	11/20/09	0.059
EXC4-SOUTH3-SDWALL1'	11/21/09	<0.050
EXC4-SOUTH4-SDWALL1'	11/21/09	<0.048
EXC4-SOUTH5-SDWALL1'	11/21/09	<0.049
EXC4-SOUTH6-SDWALL1'	11/21/09	<0.049
EXC4-SOUTH7-SDWALL1'	11/21/09	<0.050
EXC-4-South-4A-SDWALL1'	11/30/09	<0.050
EXC-4-South-4B-SDWALL1'	11/30/09	<0.050
EXC-4-South-4C-SDWALL1'	11/30/09	<0.050
EXC4-EAST1-SDWALL1'	11/21/09	<0.490
EXC4-EAST2SDWALL1'	11/19/09	<0.050
EXC4-EAST3SDWALL1'	11/19/09	<0.050
EXC4-EAST4SDWALL1'	11/19/09	<0.050
EXC4-EAST5SDWALL1'	11/19/09	<0.050
EXC4-EAST6-SDWALL1'	11/21/09	<0.049
EXC4-EAST7-SDWALL1'	11/21/09	<0.050
EXC4-EAST8-SDWALL1'	<0.050	
REGULATORY CONCENTRA		
Soil Cleanup Goal	0.130	

Analytical Results for Confirmation Soil Samples Collected from EXC-4, PCBs Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California

concentrations in milligrams per kilogram (mg/kg)

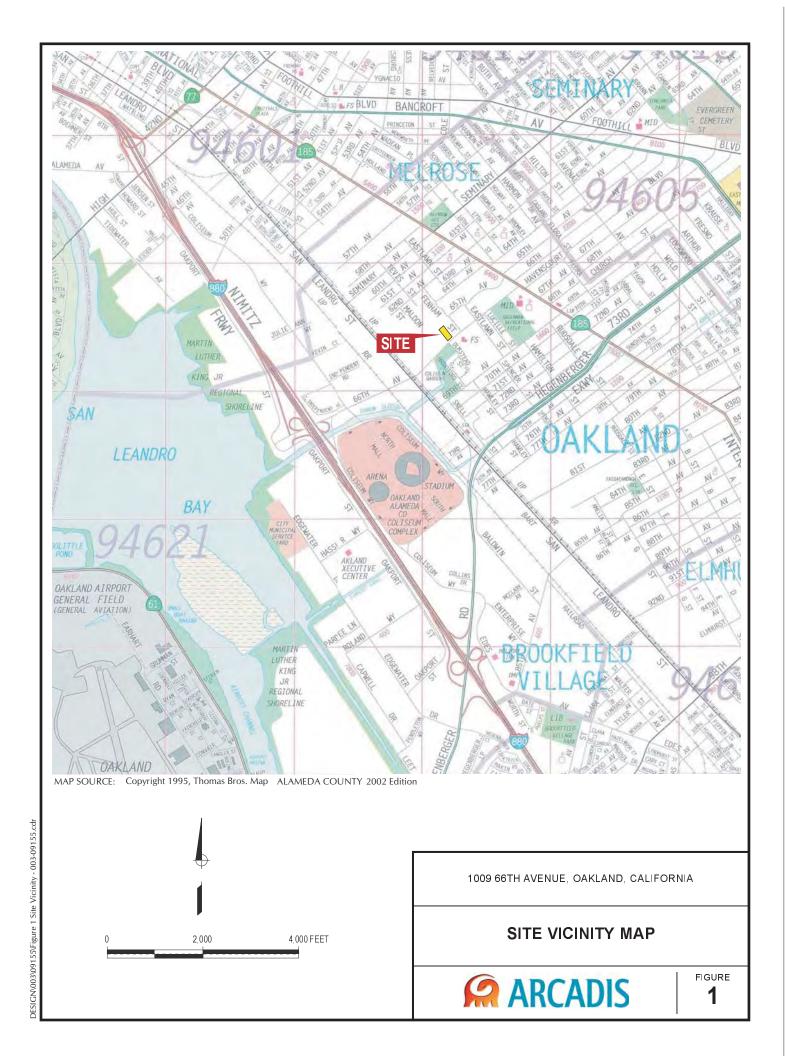
Notes:

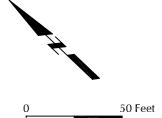
Samples analyzed by TestAmerica Laboratories Inc. and Curtis and Tompkins for PCBs using EPA Test Method 8082.

Bold font denotes results above soil cleanup goal.

Italic font denotes results of sample collected at the location of "over-excavation" where analytical results were above cleanup goals.

PCBs = polychlorinated biphenyls

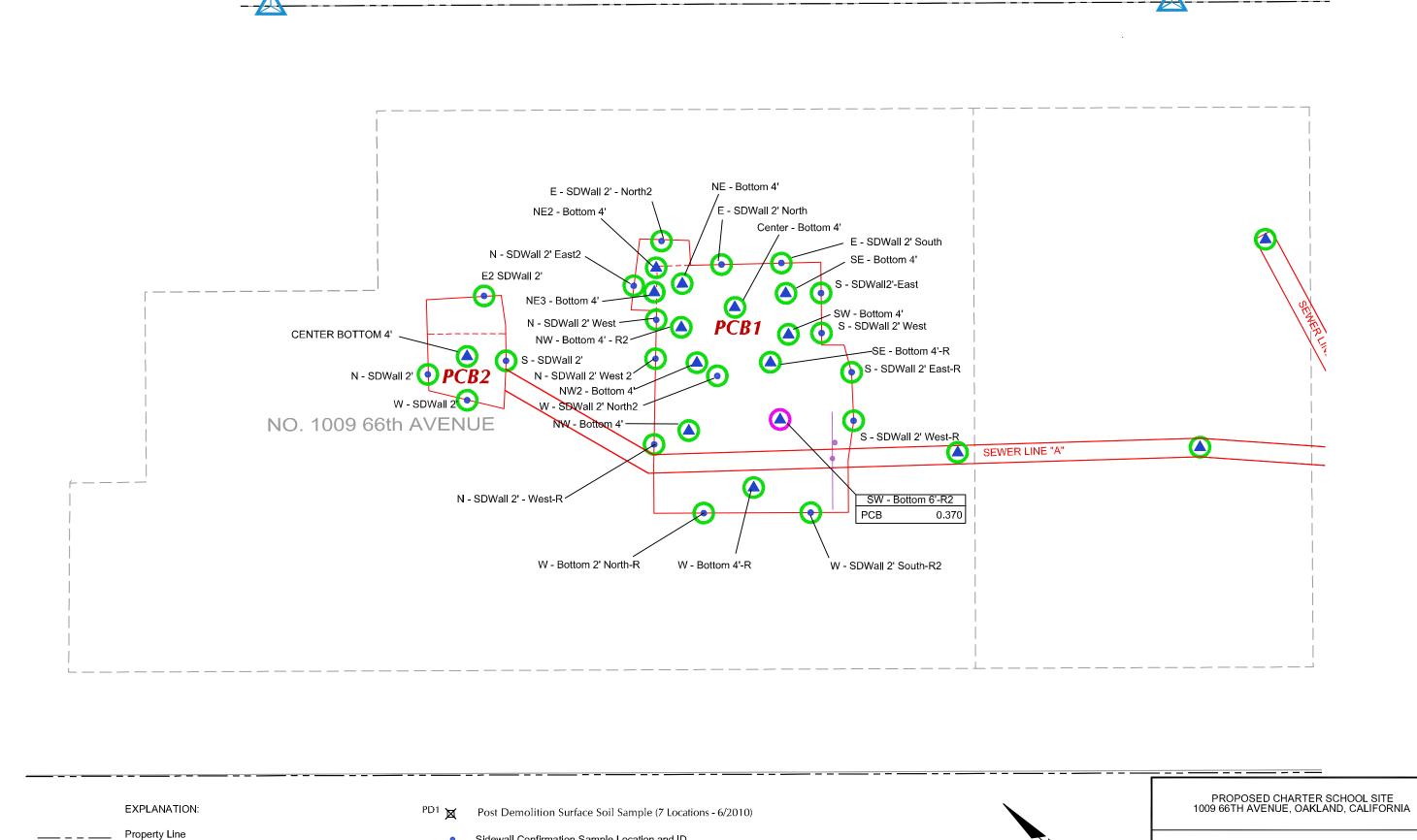




SITE PLAN



FIGURE 2



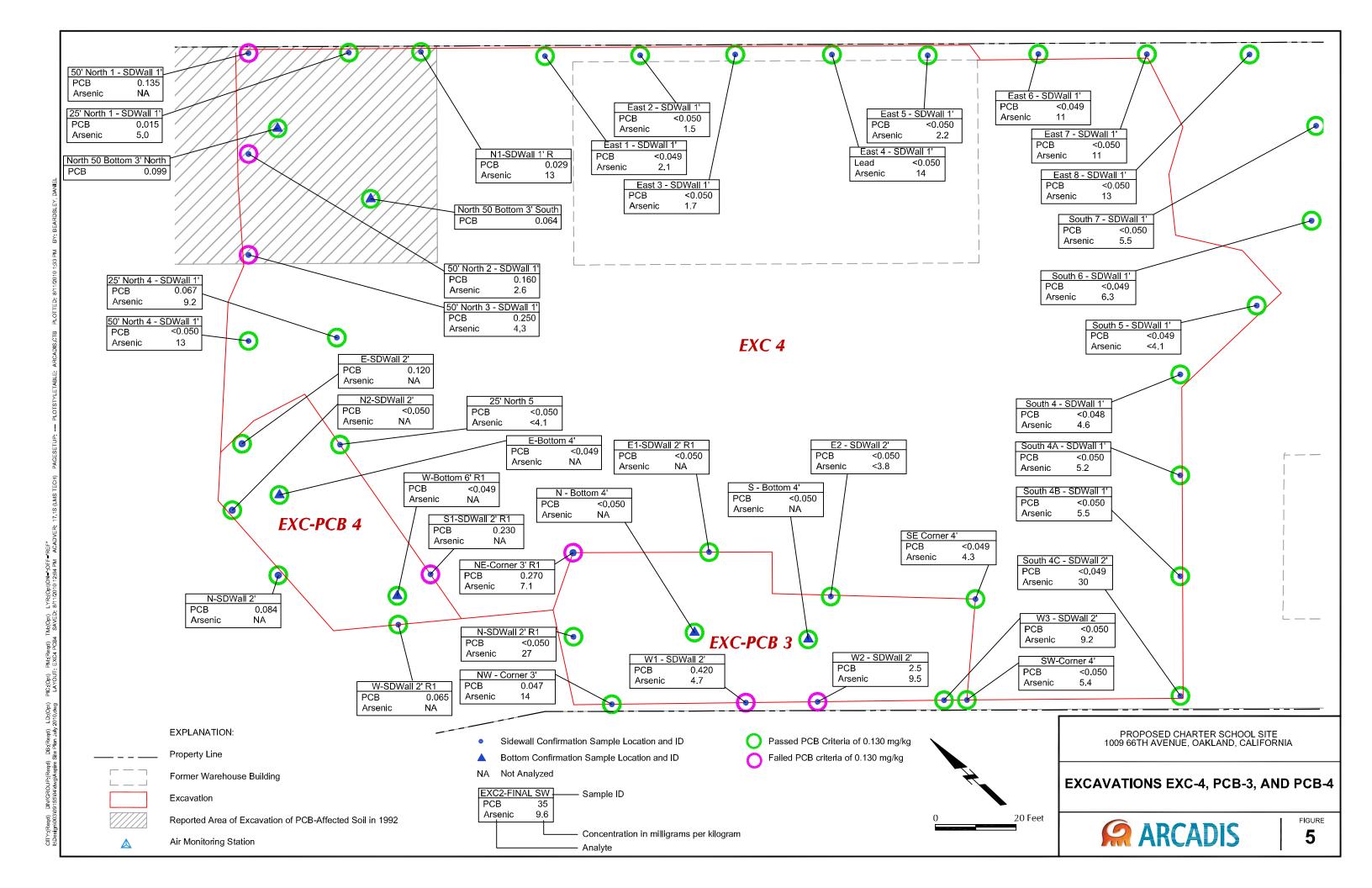


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EXCAVATIONS PCB-1 AND PCB-2



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Appendix A

Human Health Risk Evaluation

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Appendix A-Risk Evaluation-EM009155.doc

Human Health Risk Evaluation

Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California

1. Introduction

In 2006, LFR Inc. (LFR) performed a baseline risk evaluation using the assumptions of residential exposure, as designated in the Preliminary Endangerment Assessment Guidance Manual (Department of Toxic Substances Control [DTSC] 1999). A detailed description of the methods and procedures of this risk evaluation was presented in LFR 2006. The results indicated that chemicals of potential concern (COPCs) were detected at concentrations associated with human health risks above regulatory targets.

The total excess cancer risk posed by the presence of chemicals in soil was calculated to be 9 x 10-3 (LFR 2006). The majority of this total risk is attributable to the presence of arsenic, chromium (VI), benzene, polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs) at the Former Pacific Electric Motors (PEM) Facility located at 1009 66th Avenue in Oakland, California ("the Site").

The total hazard index (HI) was calculated to be 128. The majority of the total noncancerous hazard is attributable to PCBs.

In 2009 and 2010, extensive soil removal actions were performed at the Site, targeting the COPCs with elevated concentrations. Confirmation sampling was performed throughout the removal activities. A summary of the analytical results for confirmation soil samples analyzed for polychlorinated biphenyls (PCBs) is provided as Table A-1. These data represent the concentrations of PCBs that are present at the Site after the removal action was completed. The health risk evaluation was performed again considering the current post-removal conditions.

The purpose of this human health risk evaluation is to assess whether the residual COPC concentrations in the in-place, post-removal soil have been sufficiently reduced to no longer pose a health risk to the future population.

2. Cleanup Goal Development

Compounds were selected for cleanup goal development if they were identified in the baseline risk assessment as having a greater than one in one million risk or a hazard quotient greater than 1. Based on these criteria, the following chemicals were selected for development of cleanup goals:

Appendix A-Risk Evaluation-EM009155.doc



Human Health Risk Evaluation

Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California

benzene (soil and groundwater)	• benzo(a)pyrene
benzo(a)anthracene	benzo(k)fluoranthene
• PCBs	• arsenic
• lead	naphthalene
• total petroleum hydrocarbons (TPH) as gasoline (TPHg)	• TPH as diesel (TPHd)
• TPH as motor oil (TPHmo)	• chrysene

Risk-based cleanup goals for these COPCs were developed for the Site with an emphasis on health protection by incorporating conservative assumptions in the risk-based calculations. Cleanup goals were calculated by algebraically transforming the standard human health risk assessment equations to solve for a concentration given a target cancer risk of 1 x 10-6 or HI of 1.

As previously discussed, details concerning the cleanup goal development were presented in the Revised Corrective Action Plan (CAP; LFR 2009). Because metals are naturally occurring, background concentrations are selected as the cleanup goal. The cleanup goals were developed for the non-metal COPCs.

The cleanup goals are presented in Table A-2.

3. Comparison of Cleanup Goals to Post-Removal Soil Concentrations

The cleanup goal health-based screen was performed as follows. First, exposure point concentrations (EPCs) were developed for each detected COPC in the in-place soils. Per both DTSC and U.S. EPA human health risk assessment guidance (DTSC 1996, U.S. Environmental Protection Agency [U.S. EPA] 1989), 95 percent upper confidence limit (95% UCL) of the mean was used as the EPC.

Ninety-five percent UCLs were calculated using the U.S. EPA software ProUCL version 4.00.05 (U.S. EPA 2010). Per the U.S. EPA authorization (e-mail communication), reporting limits were used as proxy concentrations for non-detections. As recommended in the ProUCL guidance document (U.S. EPA 2010), statistical evaluations were performed for COPCs with a minimum of six detections. Otherwise, the maximum detected concentration was used for the cleanup goal screen. ProUCL calculates the appropriate distribution and the 95% UCL associated with the distribution. If the data do not follow a typical distribution, then a non-parametric method was used in generating the 95% UCL. The ProUCL calculated 95% UCL was

Appendix A-Risk Evaluation-EM009155.doc 2

Human Health Risk Evaluation

Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California

used as the EPC for the cleanup goal human health risk screen. The ProUCL outputs are provided in Attachment 1.

The human health risk screen was performed by comparing the 95% UCL to the risk-based cleanup goals, using the following method:

Comparisons were performed as follows for carcinogenic compounds:

$$RiskEPC = \frac{EPCsoil \times TRisk}{CUG}$$

Where:

RiskEPC = estimated risk for COPC (target = 10⁻⁶)
EPCsoil = exposure point concentration for soil
TRisk = target risk used for the CUP calculation (10⁻⁶)
CUP = cleanup goal presented for the COPCs in CAP

Comparisons were performed as follows for non-carcinogenic compounds:

$$HazardEPC = \frac{EPCsoil}{CUG}$$

Where:

HazardEPC = estimated risk for Site (target = 1)

EPCsoil = exposure point concentration for soil

CUP = cleanup goal presented for the COPCs in CAP

The results of the health screen are presented below.



Human Health Risk Evaluation

Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California

Table A-2. Cleanup Goal Screen Results

СОРС	Cleanup Goal	Post-Removal Action 95% UCL Concentration	Estimated Risk Based on Representative Concentration	Estimated Hazard Based on Representative Concentration
TPHg	450	NA	NA	NA
TPHd	450	659		1
TPHmo	800	233.5		0.3
Benzo(a)pyrene	0.13	NA	NA	NA
Benzo(a)anthracene	1.3	NA	NA	NA
Benzo(k)fluoranthene*	1.3	0.11	8.E-08	
Chrysene*	21	0.19	9.E-09	
Naphthalene	2.8	NA	NA	NA
Benzene*	0.27	0.012	4.E-08	0.0
Arsenic	7	8.8		1
Lead	80	57		0.8
PCBs	0.13	0.27	2.1E-06	2.1
Totals			2.2E-06	4.E+00

Notes:

*Fewer than six detections; maximum concentration used for representative concentration NA = not applicable, no detections above analytical reporting limits

= not calculated because not a carcinogen

The removal action has successfully reduced the estimated risk from 9 x 10-3 to 2 x 10-6. However, 2 x 10-6 is above the DTSC risk target of 1 x 10-6. Additional mitigation will be necessary to reduce the estimated health risk to the future receptors.

4. Health Evaluation of Lead in Soil

The DTSC has developed specific guidance for evaluating exposure and the potential for adverse health effects resulting from exposure to lead in the environment using a model based on absorbed doses and estimated blood-lead concentrations. The guidance is implemented using a spreadsheet obtained from the DTSC, in which a multi-pathway algorithm is used for estimating blood-lead concentrations in children and adults.

Human Health Risk Evaluation

Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California

Using the representative concentration of lead detected in in-place soil (57 milligrams per kilogram [mg/kg]), the 99th percentile blood-lead level associated with exposure to lead from both the Site and background sources in air and drinking water is 5.8 micrograms per deciliter (μ g/dl) for children (the most sensitive receptors), a level that is below the former target concentration of 10 μ g/dl (DTSC 1992). Therefore, the 99th percentile blood-lead level associated with exposure to lead from both the Site and background sources in air and drinking water is at a level below 10 μ g/dl (LFR 2006). Currently, the DTSC expresses that exposures to lead cannot increase blood-lead levels more than 1 above background blood levels. Background blood levels for the Oakland, California area are not currently available. However, using the analytical results for in-place soil samples collected at the Site as input parameters, the ProUCL calculated a representative lead concentration of 57.2 mg/kg for the Site that is below the DTSC lead residential California Human Health Screening Level (CHHSL) of 80 mg/kg. Therefore, exposure to lead in soil is no longer considered a health concern at the Site. The LeadSpread output is included in Attachment 2.

5. Additional Health Risk Screen

An air sparging/soil-vapor extraction (AS/SVE) system is currently operating on site. The vapor intrusion pathway will be evaluated after the AS/SVE remediation and confirmation soil-gas sampling are completed. The human health risk evaluation presented in this report only considers the soil exposure pathway. When the AS/SVE is shut down, a similar approach will be performed to calculate potential health risks associated with the vapor intrusion pathway.

6. Conclusions

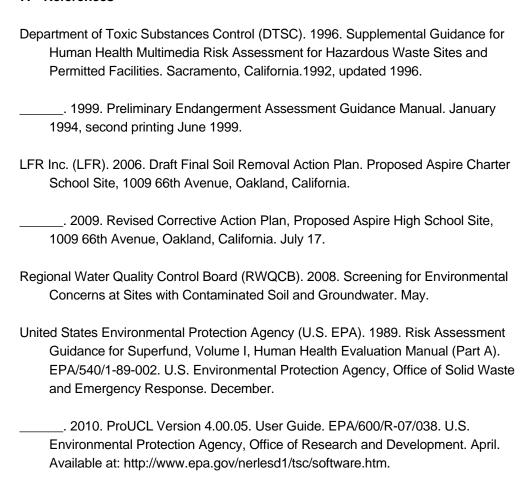
The results of the human health risk screen performed considering the post-removal, in-place soils were magnitudes lower than the baseline risk assessment results. The initial human health risk evaluation results were 9×10^{-3} and the current in-place soil risk results are 2×10^{-6} . However, 2×10^{-6} is above the DTSC target risk of 1×10^{-6} . This represents a significant reduction. Therefore, additional risk reduction activities, such as the addition of a cap, should be considered. In addition, the vapor intrusion pathway should be evaluated after the completion of the groundwater remediation program.

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Human Health Risk Evaluation

Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California

7. References



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Table A-1 PCB Data In Place at Aspire School Site Oakland, California

concentrations in milligrams per kilogram (mg/kg)

EXC-PCB-1 W-SIDEWALL 2' NORTH 2	Sample ID	PCBs
EXC-PCB-1 S-SIDEWALL 2' EAST	•	<0.050
EXC-PCB-1 S-SIDEWALL 2' WEST	EXC-PCB-1 N-SIDEWALL 2' WEST 2	0.069
EXC-PCB-1 N-SIDEWALL 2' WEST	EXC-PCB-1 S-SIDEWALL 2' EAST	<0.050
EXC-PCB1 N-SDWALL-2'-EAST2	EXC-PCB-1 S-SIDEWALL 2' WEST	<0.050
EXC-PCB-1 E-SIDEWALL 2' NORTH	EXC-PCB-1 N-SIDEWALL 2' WEST	<0.050
EXC-PCB-1 E-SIDEWALL 2' SOUTH	EXC-PCB1 N-SDWALL-2'-EAST2	<0.050
EXC-PCB1 E-SDWALL-2'-NORTH2 <0.050 EXC-PCB-1 NW2 BOTTOM 4' <0.050 EXC PCB1-NW-BOTTOM4'-R2 <0.050 EXC-PCB-1 NE BOTTOM 4' <0.050 EXC-PCB1E-NE2-BOTTOM 4' <0.050 EXC-PCB1E-NE2-BOTTOM 4' <0.050 EXC-PCB1E-NE3-BOTTOM 4' <0.050 EXC-PCB-1 CENTER BOTTOM 4' <0.058 EXC-PCB-1 SW BOTTOM 4' <0.050 EXC-PCB-1 SW BOTTOM 4' <0.050 EXC-PCB-1 SE BOTTOM 4' <0.050 EXC TPH/PCB1-SW-BOTTOM 4'-R <0.050 EXC TPH/PCB1 SE-BOTTOM 4'-R <0.050 EXC TPH/PCB1 NW-BOTTOM 4'-R <0.050 EXC TPH/PCB1 NW-BOTTOM 4'-R <0.050 EXC TPH/PCB1 N-SDWALL2'-EAST-R <0.050 EXC TPH1PCB1 S-SDWALL2'-WEST-R <0.049 EXC TPH1PCB1 S-SDWALL2'-WEST-R <0.050 EXC TPH1PCB1 W-SDWALL2'-NORTH-R2 <0.050 EXC TPH1PCB1W-SDWALL2'-NORTH-R <0.050 EXC-PCB-2 W-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050	EXC-PCB-1 E-SIDEWALL 2' NORTH	<0.050
EXC-PCB-1 NW2 BOTTOM 4' EXC PCB1-NW-BOTTOM4'-R2 EXC-PCB-1 NE BOTTOM 4' EXC-PCB1E-NE2-BOTTOM 4' EXC-PCB1E-NE3-BOTTOM 4' EXC-PCB-1 CENTER BOTTOM 4' EXC-PCB-1 SW BOTTOM 4' EXC-PCB-1 SW BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE-BOTTOM 4'-R EXC TPH/PCB1-SW-BOTTOM8'-R3 EXC TPH/PCB1 SE-BOTTOM 4'-R EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1 NW-BOTTOM 4'-R EXC TPH/PCB1 N-SDWALL2'-EAST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 N-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-NORTH-R2 EXC TPH1PCB1 W-SDWALL2'-NORTH-R2 EXC-PCB-2 W-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 CENTER BOTTOM 4' EXC PCB-3 N-BOTTOM4' EXC-PCB-1 E-SIDEWALL 2' SOUTH	<0.050	
EXC PCB1-NW-BOTTOM4'-R2	EXC-PCB1 E-SDWALL-2'-NORTH2	<0.050
EXC-PCB-1 NE BOTTOM 4' EXC-PCB1E-NE2-BOTTOM 4' EXC-PCB1E-NE3-BOTTOM 4' EXC-PCB-1 CENTER BOTTOM 4' EXC-PCB-1 SW BOTTOM 4' EXC-PCB-1 SW BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC TPH/PCB1-SW-BOTTOM8¹-R3 EXC TPH/PCB1 SE-BOTTOM 4'-R EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1W-BOTTOM4'-R EXC TPH/PCB1 N-SDWALL2'-EAST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC-PCB-2 W-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 CENTER BOTTOM 4' EXC PCB-2 CENTER BOTTOM 4' EXC PCB-3 N-BOTTOM4' C0.050 EXC PCB-3 N-BOTTOM4' EXC PCB3 N-BOTTOM4'	EXC-PCB-1 NW2 BOTTOM 4'	<0.050
EXC-PCB1E-NE2-BOTTOM 4' EXC-PCB1E-NE3-BOTTOM 4' EXC-PCB-1 CENTER BOTTOM 4' EXC-PCB-1 SW BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC TPH/PCB1-SW-BOTTOM8¹-R3 EXC TPH1PCB1 SE-BOTTOM 4'-R EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1W-BOTTOM4'-R EXC TPH/PCB1W-BOTTOM4'-R EXC TPH1PCB1 S-SDWALL2'-EAST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2' EXC-PCB-2 W-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 CENTER BOTTOM 4' EXC PCB-3 N-BOTTOM4' EXC PCB3 N-BOTTOM4'	EXC PCB1-NW-BOTTOM4'-R2	<0.050
EXC-PCB1E-NE3-BOTTOM 4' EXC-PCB-1 CENTER BOTTOM 4' EXC-PCB-1 SW BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC TPH/PCB1-SW-BOTTOM8¹-R3 EXC TPH/PCB1 SE-BOTTOM 4'-R EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1W-BOTTOM4'-R EXC TPH/PCB1 S-SDWALL2'-EAST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-NORTH-R2 EXC TPH1PCB1W-SDWALL2'-NORTH-R2 EXC TPH1PCB1W-SDWALL2' EXC TPH1PCB1W-SDWALL2' EXC-PCB-2 W-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 CENTER BOTTOM 4' EXC PCB-3 N-BOTTOM4' EXC PCB-3 N-BOTTOM4' SO.050 EXC PCB-3 N-BOTTOM4' EXC PCB-3 N-BOTTOM4' EXC PCB-3 N-BOTTOM4' SO.050 EXC PCB-3 N-BOTTOM4' EXC PCB-3 N-BOTTOM4' SO.050	EXC-PCB-1 NE BOTTOM 4'	<0.050
EXC-PCB-1 CENTER BOTTOM 4' EXC-PCB-1 SW BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' EXC TPH/PCB1-SW-BOTTOM8¹-R3 EXC TPH1PCB1 SE-BOTTOM 4'-R EXC TPH/PCB1 NW-BOTTOM 4'-R EXC TPH/PCB1 NW-BOTTOM 4'-R EXC TPH/PCB1W-BOTTOM4'-R EXC TPH/PCB1W-BOTTOM4'-R EXC TPH1PCB1 S-SDWALL2'-EAST-R EXC TPH1PCB1 N-SDWALL2'-WEST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-NORTH-R2 EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC-PCB-2 W-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 CENTER BOTTOM 4' EXC PCB-3 N-BOTTOM4' EXC PCB-3 N-BOTTOM4' C0.050 EXC PCB-3 N-BOTTOM4'	EXC-PCB1E-NE2-BOTTOM 4'	<0.050
EXC-PCB-1 SW BOTTOM 4' EXC-PCB-1 SE BOTTOM 4' (0.050 EXC TPH/PCB1-SW-BOTTOM8¹-R3 (0.370 EXC TPH1PCB1 SE-BOTTOM 4'-R (0.050 EXC TPH/PCB1 NW-BOTTOM 4'-R (0.050 EXC TPH/PCB1W-BOTTOM 4'-R (0.050 EXC TPH/PCB1W-BOTTOM4'-R (0.050 EXC TPH1PCB1 S-SDWALL2'-EAST-R (0.050 EXC TPH1PCB1 S-SDWALL2'-WEST-R (0.050 EXC TPH1PCB1 W-SDWALL2'-WEST-R (0.050 EXC TPH1PCB1 W-SDWALL2'-NORTH-R2 (0.050 EXC TPH1PCB1W-SDWALL2'-NORTH-R (0.050 EXC-PCB-2 W-SIDEWALL 2' (0.050 EXC-PCB-2 SO-SIDEWALL 2' (0.050 EXC-PCB-2 SO-SIDEWALL 2' (0.050 EXC-PCB-2 CENTER BOTTOM 4' (0.050 EXC-PCB-2 CENTER BOTTOM 4' (0.050)	EXC-PCB1E-NE3-BOTTOM 4'	<0.050
EXC-PCB-1 SE BOTTOM 4' EXC TPH/PCB1-SW-BOTTOM8 ¹ -R3 0.370 EXC TPH1PCB1 SE-BOTTOM 4'-R <0.050 EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1W-BOTTOM 4'-R <0.050 EXC TPH/PCB1W-BOTTOM4'-R EXC TPH1PCB1 S-SDWALL2'-EAST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-WEST-R EXC TPH1PCB1W-SDWALL2'-NORTH-R2 EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC-PCB-2 W-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 CENTER BOTTOM 4' EXC PCB-3 N-BOTTOM4' <0.050 EXC PCB-3 N-BOTTOM4' <0.050 EXC PCB-3 N-BOTTOM4' <0.050	EXC-PCB-1 CENTER BOTTOM 4'	0.074
EXC TPH/PCB1-SW-BOTTOM8 ¹ -R3 0.370 EXC TPH1PCB1 SE-BOTTOM 4'-R <0.050 EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1W-BOTTOM4'-R <0.050 EXC TPH1PCB1 S-SDWALL2'-EAST-R <0.050 EXC TPH1PCB1 N-SDWALL2'-WEST-R EXC TPH1PCB1 S-SDWALL2'-WEST-R EXC TPH1PCB1 W-SDWALL2'-SOUTH-R2 EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2'-NORTH-R EXC TPH1PCB1W-SDWALL2' EXC-PCB-2 W-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 CENTER BOTTOM 4' C0.050 EXC-PCB-2 CENTER BOTTOM 4' EXC PCB3 N-BOTTOM4' C0.050	EXC-PCB-1 SW BOTTOM 4'	0.058
EXC TPH1PCB1 SE-BOTTOM 4'-R < 0.050 EXC TPH/PCB1 NW-BOTTOM 4' < 0.050 EXC TPH/PCB1W-BOTTOM4'-R < 0.050 EXC TPH1PCB1 S-SDWALL2'-EAST-R < 0.050 EXC TPH1PCB1 N-SDWALL2'-WEST-R < 0.049 EXC TPH1PCB1 S-SDWALL2'-WEST-R < 0.050 EXC TPH1PCB1 W-SDWALL2'-SOUTH-R2 < 0.050 EXC TPH1PCB1W-SDWALL2'-NORTH-R < 0.050 EXC TPH1PCB1W-SDWALL2' < 0.050 EXC-PCB-2 W-SIDEWALL 2' < 0.050 EXC-PCB-2 E2-SIDEWALL 2' < 0.050 EXC-PCB-2 SO-SIDEWALL 2' < 0.050 EXC-PCB-2 N-SIDEWALL 2' < 0.050 EXC-PCB-2 CENTER BOTTOM 4' < 0.050 EXC-PCB-2 CENTER BOTTOM 4' < 0.050	EXC-PCB-1 SE BOTTOM 4'	<0.050
EXC TPH/PCB1 NW-BOTTOM 4' EXC TPH/PCB1W-BOTTOM4'-R <0.050 EXC TPH1PCB1 S-SDWALL2'-EAST-R <0.050 EXC TPH1PCB1 N-SDWALL2'-WEST-R <0.049 EXC TPH1PCB1 S-SDWALL2'-WEST-R <0.050 EXC TPH1PCB1 W-SDWALL2'-WEST-R <0.050 EXC TPH1PCB1W-SDWALL2'-SOUTH-R2 EXC TPH1PCB1W-SDWALL2'-NORTH-R <0.050 EXC-PCB-2 W-SIDEWALL 2' EXC-PCB-2 E2-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 SO-SIDEWALL 2' EXC-PCB-2 N-SIDEWALL 2' EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050	EXC TPH/PCB1-SW-BOTTOM8 ¹ -R3	0.370
EXC TPH/PCB1W-BOTTOM4'-R <0.050 EXC TPH1PCB1 S-SDWALL2'-EAST-R <0.050 EXC TPH1PCB1 N-SDWALL2'-WEST-R <0.049 EXC TPH1PCB1 S-SDWALL2'-WEST-R <0.050 EXC TPH1PCB1 W-SDWALL2'-SOUTH-R2 <0.050 EXC TPH1PCB1W-SDWALL2'-NORTH-R <0.050 EXC-PCB-2 W-SIDEWALL 2' <0.050 EXC-PCB-2 E2-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050	EXC TPH1PCB1 SE-BOTTOM 4'-R	<0.050
EXC TPH1PCB1 S-SDWALL2'-EAST-R <0.050 EXC TPH1PCB1 N-SDWALL2'-WEST-R <0.049 EXC TPH1PCB1 S-SDWALL2'-WEST-R <0.050 EXC TPH1PCB1 W-SDWALL2'-SOUTH-R2 <0.050 EXC TPH1PCB1W-SDWALL2'-NORTH-R <0.050 EXC-PCB-2 W-SIDEWALL 2' <0.050 EXC-PCB-2 E2-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050	EXC TPH/PCB1 NW-BOTTOM 4'	<0.050
EXC TPH1PCB1 N-SDWALL2'-WEST-R <0.049 EXC TPH1PCB1 S-SDWALL2'-WEST-R <0.050 EXC TPH1PCB1 W-SDWALL2'-SOUTH-R2 <0.050 EXC TPH1PCB1W-SDWALL2'-NORTH-R <0.050 EXC-PCB-2 W-SIDEWALL 2' <0.050 EXC-PCB-2 E2-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-3 N-BOTTOM4' <0.050	EXC TPH/PCB1W-BOTTOM4'-R	<0.050
EXC TPH1PCB1 S-SDWALL2'-WEST-R <0.050 EXC TPH1PCB1 W-SDWALL2'-SOUTH-R2 <0.050 EXC TPH1PCB1W-SDWALL2'-NORTH-R <0.050 EXC-PCB-2 W-SIDEWALL 2' <0.050 EXC-PCB-2 E2-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050	EXC TPH1PCB1 S-SDWALL2'-EAST-R	<0.050
EXC TPH1PCB1 W-SDWALL2'-SOUTH-R2 <0.050 EXC TPH1PCB1W-SDWALL2'-NORTH-R <0.050 EXC-PCB-2 W-SIDEWALL 2' <0.050 EXC-PCB-2 E2-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-3 N-BOTTOM4' <0.050	EXC TPH1PCB1 N-SDWALL2'-WEST-R	<0.049
EXC TPH1PCB1W-SDWALL2'-NORTH-R <0.050 EXC-PCB-2 W-SIDEWALL 2' <0.050 EXC-PCB-2 E2-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-3 N-BOTTOM4' <0.050	EXC TPH1PCB1 S-SDWALL2'-WEST-R	<0.050
EXC-PCB-2 W-SIDEWALL 2' <0.050 EXC-PCB-2 E2-SIDEWALL 2' <0.050 EXC-PCB-2 SO-SIDEWALL 2' <0.050 EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC-PCB-3 N-BOTTOM4' <0.050	EXC TPH1PCB1 W-SDWALL2'-SOUTH-R2	<0.050
EXC-PCB-2 E2-SIDEWALL 2' <0.050	EXC TPH1PCB1W-SDWALL2'-NORTH-R	<0.050
EXC-PCB-2 E2-SIDEWALL 2' <0.050	EXC-PCB-2 W-SIDEWALL 2'	<0.050
EXC-PCB-2 N-SIDEWALL 2' <0.050 EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC PCB3 N-BOTTOM4' <0.050		
EXC-PCB-2 CENTER BOTTOM 4' <0.050 EXC PCB3 N-BOTTOM4' <0.050	EXC-PCB-2 SO-SIDEWALL 2'	<0.050
EXC PCB3 N-BOTTOM4' <0.050		<0.050
	EXC-PCB-2 CENTER BOTTOM 4'	<0.050
EXC PCB3 S-BOTTOM4'	EXC PCB3 N-BOTTOM4'	<0.050
12/13 320 0 20 10 m 1	EXC PCB3 S-BOTTOM4'	<0.050

Table A-1 PCB Data In Place at Aspire School Site Oakland, California

concentrations in milligrams per kilogram (mg/kg)

Sample ID	PCBs
EXC PCB3-SE-CORNER4'	<0.049
EXC PCB3-NE-CORNER3'R1	0.270
EXC PCB3-E1-SDWALL2'R1	<0.050
EXC PCB3-E2-SDWALL2'	<0.050
EXC PCB3-NW-Corner 4'	0.047
EXC PCB3-SW-CORNER4'	< 0.050
EXC PCB3-W1-SDWALL4'	0.420
EXC PCB3-W2-SDWALL4'	2.500
EXC PCB3-W3-SDWALL2'	<0.050
EXC PCB3-N-SDWALL2'	<0.050
EXC PCB3-N-SDWALL2'R1	<0.050
EXC PCB4-N-SDWALL2'	0.084
EXC-PCB4-N2-SDWALL2'	<0.050
EXC-PCB4-S2-SDWALL2'	0.200
EXC PCB4-W-SDWALL2'R1	0.066
EXC PCB4-E-SDWALL2'	0.120
EXC-PCB4-W-BOTTOM6' R1	<0.049
EXC-PCB4-E-BOTTOM4'	<0.049
EXC4-N1-SDWALL3'-R2	0.029
EXC4-NORTH2-SDWALL1'	0.290
EXC4-NORTH3-SDWALL1'	<0.050
EXC4-NORTH4-SDWALL1'	<0.050
EXC4-NORTH5-SDWALL1'	<0.050
EXC4-NORTH6-SDWALL1'	<0.050
EXC4-25'NORTH1-SDWALL3' R	0.015
EXC4-50'NORTH1-SDWALL3'-R	0.135
EXC4-50'NORTH2-SDWALL3'-R	0.160
EXC4-50'NORTH3-SDWALL3'-R	0.029
EXC4-50'NORTH3-SDWALL1'-R	0.250
EXC4-SOUTH4-SDWALL1'	<0.048
EXC4-SOUTH5-SDWALL1'	<0.049
EXC4-SOUTH6-SDWALL1'	<0.049
EXC4-SOUTH7-SDWALL1'	<0.050
EXC-4-South-4A-SDWALL1'	<0.050
EXC-4-South-4B-SDWALL1'	<0.050
EXC-4-South-4C-SDWALL1'	<0.050
EVOA EACTA ODWALLAL	0.400
EXC4-EAST1-SDWALL1'	<0.490
EXC4-EAST2SDWALL1'	<0.050
EXC4-EAST3SDWALL1'	<0.050
EXC4-EAST4SDWALL1'	<0.050
PD-1	0.37

Table A-1 PCB Data In Place at Aspire School Site Oakland, California

concentrations in milligrams per kilogram (mg/kg)

Sample ID	PCBs
PD-2	0.94
PD-3	0.34
PD-4	0.32
PD-5	0.21
PD-6	0.54
PD-7	0.10
SB4	<0.050
SB3	0.05
3C	< 0.050
SB10	<0.050
SB9	< 0.050
3A	0.063

Attachment 1

ProUCL Outputs

General UCL Statistics for Full Data Sets ProUCL version 4.00.05

PCBs in in-place soils-mg/kg Aspire School site, Oakland, CA

1 Obe in in place colle mg/kg / topile collect cit	o, Januaria, Ort	
General Statistics		
Number of Valid Observations	86 Number of Distinct Observations	30
Number of Missing Values	21	
Raw Statistics	Log-transformed Statistics	
Minimum	0 Log Statistics Not Avaliable	
Maximum	2.5	
Mean	0.126	
Median	0.05	
SD	0.297	
Coefficient of Variation	2.364	
Skewness	6.478	
Relevant UCL Statistics		
Normal Distribution Test	Lognormal Distribution Test	
Lilliefors Test Statistic	0.348 Not Available	
Lilliefors Critical Value	0.0955	
Data not Normal at 5% Significance Level		
Assuming Normal Distribution	Assuming Lognormal Distribution	
95% Student's-t UCL	0.179 95% H-UCL	N/A
Assuming Normal Distribution	95% UCLs (Adjusted for Skewness)	
95% Student's-t UCL	0.179 95% Adjusted-CLT UCL (Chen 1995	0.202
	95% Modified-t UCL (Johnson-1978)	0.183
Gamma Distribution Test	Data Distribution	
Gamma Statistics Not Available	Data do not follow a Discernible Distrib	ution (0.05)
	95% CLT UCL	0.178
	95% Jackknife UCL	0.179
	95% Standard Bootstrap UCL	0.179
	95% Bootstrap-t UCL	0.244
	•	

95% Hall's Bootstrap UCL

95% BCA Bootstrap UCL

95% Percentile Bootstrap UCL

95% Chebyshev(Mean, Sd) UCL

99% Chebyshev(Mean, Sd) UCL

97.5% Chebyshev(Mean, Sd) UCL

0.391

0.182

0.217

0.265

0.326

0.444

Potential UCL to Use

Use 95% Chebyshev (Mean, Sd) UCL 0.265

General UCL Statistics for Full Data Sets ProUCL version 4.00.05

TPHd in Soil mg/kg

Minimum Maximum Mean Median	3100 242.4	Minimum of Log Data Maximum of Log Data Mean of log Data SD of log Data	-0.0101 8.039 3.392 2.279
SD Coefficient of Variation Skewness	640.9 2.644 4.013		
Relevant UCL Statistics Normal Distribution Test Shapiro Wilk Test Statistic Shapiro Wilk Critical Value		Lognormal Distribution Test Shapiro Wilk Test Statistic Shapiro Wilk Critical Value	0.936 0.945
Data not Normal at 5% Significance Level	0.943	Data not Lognormal at 5% Significance Level	0.943
Assuming Normal Distribution 95% Student's-t UCL 95% UCLs (Adjusted for Skewness) 95% Adjusted-CLT UCL (Chen-1995) 95% Modified-t UCL (Johnson-1978)	403 460.7 412.5	95% Chebyshev (MVUE) UCL 97.5% Chebyshev (MVUE) UCL	1631 1067 1385 2009
Gamma Distribution Test k star (bias corrected) Theta Star MLE of Mean MLE of Standard Deviation nu star	0.318 763.3 242.4 430.2 28.58		5)
Approximate Chi Square Value (.05) Adjusted Level of Significance Adjusted Chi Square Value	17.38 0.0447 17.09		399.6 403 397.5
		33 /6 Standard Bootstrap OCL	337.3
Anderson-Darling Test Statistic Anderson-Darling 5% Critical Value Kolmogorov-Smirnov Test Statistic Kolmogorov-Smirnov 5% Critical Value Data not Gamma Distributed at 5% Significance	1.853 0.856 0.198 0.143 Level	95% Hall's Bootstrap UCL 95% Percentile Bootstrap UCL	774.3 1081 412.7 492 658.9
Anderson-Darling 5% Critical Value Kolmogorov-Smirnov Test Statistic Kolmogorov-Smirnov 5% Critical Value	0.856 0.198 0.143	95% Hall's Bootstrap UCL 95% Percentile Bootstrap UCL 95% BCA Bootstrap UCL 95% Chebyshev(Mean, Sd) UCL 97.5% Chebyshev(Mean, Sd) UCL 99% Chebyshev(Mean, Sd) UCL	1081 412.7 492

TPHmo in Soil mg/kg

Anderson-Darling Test Statistic Anderson-Darling 5% Critical Value Kolmogorov-Smirnov Test Statistic Kolmogorov-Smirnov 5% Critical Value	3.361 0.784 0.305 0.156	95% Bootstrap-t UCL 95% Hall's Bootstrap UCL 95% Percentile Bootstrap UCL	197 242.7 159.7 171.9
Approximate Chi Square Value (.05) Adjusted Level of Significance Adjusted Chi Square Value	0.0422 36.78	95% Jackknife UCL 95% Standard Bootstrap UCL	156.6 157.9 156.3
Gamma Distribution Test k star (bias corrected) Theta Star MLE of Mean MLE of Standard Deviation nu star	140.6 110 124.3 53.19		.05)
Assuming Normal Distribution 95% Student's-t UCL 95% UCLs (Adjusted for Skewness) 95% Adjusted-CLT UCL (Chen-1995) 95% Modified-t UCL (Johnson-1978)		Assuming Lognormal Distribution 95% H-UCL 95% Chebyshev (MVUE) UCL 97.5% Chebyshev (MVUE) UCL 99% Chebyshev (MVUE) UCL	258.7 282.8 350.5 483.4
Relevant UCL Statistics Normal Distribution Test Shapiro Wilk Test Statistic Shapiro Wilk Critical Value Data not Normal at 5% Significance Level		Lognormal Distribution Test Shapiro Wilk Test Statistic Shapiro Wilk Critical Value Data not Lognormal at 5% Significance Level	0.788 0.933
Raw Statistics Minimum Maximum Mean Median SD Coefficient of Variation Skewness	780 110		-0.0101 6.659 3.995 1.335
General Statistics Number of Valid Observations Number of Missing Values	34 25	Number of Distinct Observations	19

Arsenic in soil, mg/kg

Number of Valid Observations Number of Missing Values Raw Statistics Log-transformed Statistics Minimum 1.5 Minimum of Log Data 0.409 Maximum 30 Maximum of Log Data 3.409 Mean 7.345 Mean of log Data 1.790 Median 5.5 SD of log Data 5.176 Coefficient of Variation Skewness Relevant UCL Statistics
Raw Statistics Minimum 1.5 Minimum of Log Data 0.409 Maximum 30 Maximum of Log Data 3.400 Mean 7.345 Mean of log Data 1.799 Median 5.5 SD of log Data 5.176 Coefficient of Variation Skewness 2.403
Minimum 1.5 Minimum of Log Data 0.405 Maximum 30 Maximum of Log Data 3.40 Mean 7.345 Mean of log Data 1.796 Median 5.5 SD of log Data 0.64 SD 5.176 Coefficient of Variation 0.705 Skewness 2.403
Minimum 1.5 Minimum of Log Data 0.405 Maximum 30 Maximum of Log Data 3.40 Mean 7.345 Mean of log Data 1.796 Median 5.5 SD of log Data 0.64 SD 5.176 Coefficient of Variation 0.705 Skewness 2.403
Maximum 30 Maximum of Log Data 3.40° Mean 7.345 Mean of log Data 1.79° Median 5.5 SD of log Data 0.6° SD 5.176 Coefficient of Variation 0.705 Skewness 2.403
Mean7.345 Mean of log Data1.796Median5.5 SD of log Data0.64SD5.176Coefficient of Variation0.705Skewness2.403
Median 5.5 SD of log Data 0.64 SD 5.176 Coefficient of Variation 0.705 Skewness 2.403
SD 5.176 Coefficient of Variation 0.705 Skewness 2.403
Coefficient of Variation 0.705 Skewness 2.403
Skewness 2.403
Relevant UCL Statistics
Relevant UCL Statistics
Normal Distribution Test Lognormal Distribution Test
Shapiro Wilk Test Statistic 0.798 Shapiro Wilk Test Statistic 0.976
Shapiro Wilk Critical Value 0.938 Shapiro Wilk Critical Value 0.938
Data not Normal at 5% Significance Level Data appear Lognormal at 5% Significance Level
Assuming Normal Distribution Assuming Lognormal Distribution
95% Student's-t UCL 8.761 95% H-UCL 9.15
95% UCLs (Adjusted for Skewness) 95% Chebyshev (MVUE) UCL 10.93
95% Adjusted-CLT UCL (Chen-1995) 9.076 97.5% Chebyshev (MVUE) UCL 12.4
95% Modified-t UCL (Johnson-1978) 8.816 99% Chebyshev (MVUE) UCL 15.57
Gamma Distribution Test Data Distribution
k star (bias corrected) 2.492 Data appear Gamma Distributed at 5% Significance Level
Theta Star 2.948
MLE of Mean 7.345
MLE of Standard Deviation 4.653
nu star 189.4
Approximate Chi Square Value (.05) 158.5 Nonparametric Statistics
Adjusted Level of Significance 0.0434 95% CLT UCL 8.726
Adjusted Chi Square Value 157.4 95% Jackknife UCL 8.76
95% Standard Bootstrap UCL 8.714
Anderson-Darling Test Statistic 0.452 95% Bootstrap-t UCL 9.216
Anderson-Darling 5% Critical Value 0.756 95% Hall's Bootstrap UCL 10.09
Kolmogorov-Smirnov Test Statistic 0.122 95% Percentile Bootstrap UCL 8.83
Kolmogorov-Smirnov 5% Critical Value 0.144 95% BCA Bootstrap UCL 9.168
Data appear Gamma Distributed at 5% Significance Leve 95% Chebyshev(Mean, Sd) UCL
97.5% Chebyshev(Mean, Sd) UCL 12.59
Assuming Gamma Distribution 99% Chebyshev(Mean, Sd) UCL 15.
95% Approximate Gamma UCL 8.773
95% Adjusted Gamma UCL 8.838
Potential UCL to Use Use 95% Approximate Gamma UCL 8.773

Lead in Soil mg/kg

Potential UCL to Use		Use 95% Approximate Gamma UCL	57.24
95% Adjusted Gamma UCL	57.59		
95% Approximate Gamma UCL	57.24	,,,,,	- - -
Assuming Gamma Distribution		99% Chebyshev(Mean, Sd) UCL	127
Data Colon Appl. Callina Distribution at 076 Olgi		97.5% Chebyshev(Mean, Sd) UCL	96.36
Data follow Appr. Gamma Distribution at 5% Sign		•	80.78
Kolmogorov-Smirnov 5% Critical Value	0.118	•	63.11
Kolmogorov-Smirnov Test Statistic	0.730	•	59.9
Anderson-Darling 5% Critical Value	0.786	•	123.4
Anderson-Darling Test Statistic	1.151		66.53
Adjusted Chi Square Value	80.01	95% Jackknife UCL 95% Standard Bootstrap UCL	58.58 58.38
Adjusted Level of Significance	0.0461		58.37
Approximate Chi Square Value (.05)		Nonparametric Statistics	E0 07
nu star Approximate Chi Square Value (05)	102.9	Nonporometria Statistica	
MLE of Standard Deviation	48.76		
MLE of Mean	44.78		
Theta Star	53.09		
k star (bias corrected)		Data Follow Appr. Gamma Distribution at 5% Significance	Level
Gamma Distribution Test	0.040	Data Distribution	
,		, ,	
95% Modified-t UCL (Johnson-1978)	59.21	, ,	145.2
95% Adjusted-CLT UCL (Chen-1995)	62.43	97.5% Chebyshev (MVUE) UCL	109.2
95% UCLs (Adjusted for Skewness)	23.00	95% Chebyshev (MVUE) UCL	90.86
95% Student's-t UCL	58.58		71.36
Assuming Normal Distribution		Assuming Lognormal Distribution	
Data not Normal at 5% Significance Level		Data appear Lognormal at 5% Significance Level	
Data not Normal at 5% Significance Level	0.113		0.113
Lilliefors Critical Value		Lilliefors Critical Value	0.13
Normal Distribution Test Lilliefors Test Statistic	0 247	Lognormal Distribution Test Lilliefors Test Statistic	0.1
Relevant UCL Statistics		Lognormal Distribution Toot	
Skewness	J.598		
Coefficient of Variation	1.441 3.598		
SD Coefficient of Variation	64.51		
Median		SD of log Data	1.242
Mean		Mean of log Data	3.132
Maximum		Maximum of Log Data	5.886
Minimum		Minimum of Log Data	-1.386
Raw Statistics	0.05	Log-transformed Statistics	4 000
D. Out it		1	
Number of Missing Values	10		
Number of Valid Observations		Number of Distinct Observations	47
General Statistics			

Attachment 2

LeadSpread Output

LEAD RISK ASSESSMENT SPREADSHEET CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

USER'S GUIDE to version 7

INPUT	
MEDIUM	LEVEL
Lead in Air (ug/m³)	0.028
Lead in Soil/Dust (ug/g)	57.2
Lead in Water (ug/l)	15
% Home-grown Produce	0%
Boonirable Duet (ug/m³)	1.5
Respirable Dust (ug/m³)	1.5

	OUTP	JT					
	Percer	tile Esti	mate of E	Blood Pb	(ug/dl)	PRG-99	PRG-95
	50th	90th	95th	98th	99th	(ug/g)	(ug/g)
BLOOD Pb, ADULT	1.2	2.1	2.5	3.1	3.5	2416	3808
BLOOD Pb, CHILD	1.9	3.5	4.2	5.1	5.8	255	435
BLOOD Pb, PICA CHILD	2.3	4.3	5.1	6.2	7.0	128	219
BLOOD Pb, OCCUPATION	4 1.1	2.1	2.5	3.0	3.4	3475	5464

EXPOSURE PARAMETERS

	units	adults	childre
Days per week	days/wk	7	
Days per week, occupation	onal	5	
Geometric Standard Devi	iation	1.6	
Blood lead level of conce	rn (ug/dl)	1	0
Skin area, residential	cm ²	5700	2900
Skin area occupational	cm ²	2900	
Soil adherence	ug/cm ²	70	200
Dermal uptake constant	(ug/dl)/(ug/da	0.0001	
Soil ingestion	mg/day	50	100
Soil ingestion, pica	mg/day		200
Ingestion constant	(ug/dl)/(ug/da	0.04	0.16
Bioavailability	unitless	0.4	14
Breathing rate	m ³ /day	20	6.8
Inhalation constant	(ug/dl)/(ug/da	0.08	0.19
Water ingestion	l/day	1.4	0.4
Food ingestion	kg/day	1.9	1.1
Lead in market basket	ug/kg	3.	1
Lead in home-grown produce	ug/kg	25	.8

Click here for REFERENCES

PATHWAYS								
ADULTS	R	esident	ial -	0	ccupation	ial		
	Pathw	ay cont	ribution	Pathw	ray contri	bution		
Pathway	PEF	ug/dl	percent	nt PEF ug/dl per				
Soil Contact	3.8E-5	0.00	0%	1.4E-5	0.00	0%		
Soil Ingestion	8.8E-4	0.05	4%	6.3E-4	0.04	3%		
Inhalation, bkgrnd		0.05	4%		0.03	3%		
Inhalation	2.5E-6	0.00	0%	1.8E-6	0.00	0%		
Water Ingestion		0.84	72%		0.84	73%		
Food Ingestion, bkgrn	d	0.23	20%	0.23 20 9		20%		
Food Ingestion	3.4E-7	0.00	0%			0%		

CHILDREN		typical		with pica					
	Pathw	ay cont	ribution	Pathw	ay contri	bution			
Pathway	PEF	ug/dl	percent	PEF	ug/dl	percent			
Soil Contact	5.6E-5	0.00	0%		0.00	0%			
Soil Ingestion	7.0E-3	0.40	21%	1.4E-2	0.81	34%			
Inhalation	2.0E-6	0.00	0%		0.00	0%			
Inhalation, bkgrnd		0.04	2%		0.04	2%			
Water Ingestion		0.96	49%		0.96	41%			
Food Ingestion, bkgrn	d	0.54	28%		0.54	23%			
Food Ingestion	7.9E-7	0.00	0%		0.00	0%			

Appendix B

Hazardous Waste Manifests and Weight Summary Reports from Waste Management and Republic Services



Englishment Santaer of Embrary Landand a test santaer) \$1500-009 [\$ 740 08] [\$700 -00-05 \$100	TVISTON OF BUILDING CONTRACTOR	TOTAL STREET	TALLASS, ASSESSED A SECTION	No. 10 Margonia de Actor do marco do mesos de marco de marco de marco de marco de marco de marco de marco de m
				UNDERSONAL ENGINEERING PRODUCTION AS INCOME THE	Goring a second standard and second
11 (10 (2000 (2000)	04570005	·			
11/19/2009/006299826JJK		75280	31960	43320	21.66 ASPIRE PUBLIC SCHOOLS
√006299827JJK		77360	32040	45320	22.66 ASPIRE PUBLIC SCHOOLS
√006299829JJK		80360	30600	49760	24.88 ASPIRE PUBLIC SCHOOLS
√006299830JJK		91200	32020	59180	29.59 ASPIRE PUBLIC SCHOOLS
√006299831JJK		76560	29540	47020	23.51 ASPIRE PUBLIC SCHOOLS
√06299832JJK	CA578935	80580	32600	47980	23.99 ASPIRE PUBLIC SCHOOLS
TOTAL				292580	146.29
COUNT 6					
11/20/2009 ¢06299828JJK		81700	30160	51540	25.77 ASPIRE PUBLIC SCHOOLS
√ 906299833JJK		64220	34060	30160	15.08 ASPIRE PUBLIC SCHOOLS
√ 006299834JJK	CA578935	71340	33660	37680	18.84 ASPIRE PUBLIC SCHOOLS
TOTAL				119380	59.69
COUNT 3					
12/10/2009 006299813JJK	CA578935	80200	34840	45360	22.68 ASPIRE PUBLIC SCHOOLS
√006299814JJK	CA578935	79820	32540	47280	23.64 ASPIRE PUBLIC SCHOOLS
<i>-</i> 006299815JJK	CA578935	78960	30560	48400	24.2 ASPIRE PUBLIC SCHOOLS
√ó06299816JJK	CA578935	91000	32380	58620	29.31 ASPIRE PUBLIC SCHOOLS
√006299817JJK	CA578935	77000	32620	44380	22.19 ASPIRE PUBLIC SCHOOLS
TOTAL				244040	122.02
COUNT 5				_,,,,,,	
12/11/2009 <i>-</i> 006299812JJK	CA578935	84060	30800	53260	26.63 ASPIRE PUBLIC SCHOOLS
TOTAL				53260	26.63
COUNT 1				00200	20.00
12/29/2009 √ 005417898JJK	CA578935	74300	32100	42200	21.1 ASPIRE PUBLIC SCHOOLS
√005417899JJK		79340	30560	48780	24.39 ASPIRE PUBLIC SCHOOLS
√005417900JJK		77360	31480	45880	22.94 ASPIRE PUBLIC SCHOOLS
√005417901JJK		80280	34140	46140	23.07 ASPIRE PUBLIC SCHOOLS
√005417927JJK		85520	34520	51000	
✓005417928JJK		84100	33060	51040	25.5 ASPIRE PUBLIC SCHOOLS
√005417929JJK		81640	32220		25.52 ASPIRE PUBLIC SCHOOLS
√005417930JJK		89760	32220 32460	49420	24.71 ASPIRE PUBLIC SCHOOLS
√005417931JJK		79700		57300	28.65 ASPIRE PUBLIC SCHOOLS
000417001001	G/101 0830	19100	31000	48700	24.35 ASPIRE PUBLIC SCHOOLS

√ 005417932	JJK CA578935	80220	30700	49520	24 76	ASPIRE PUBLIC SCHOOLS
,	JJK CA578935	76420	32180	44240		ASPIRE PUBLIC SCHOOLS
TOTAL			02.00	534220	267.11	ACT THE TOBERO CONTOCES
COUNT	11			00.220	201.11	
12/30/2009-005417902	JJK CA578935	80340	27580	52760	26.38	ASPIRE PUBLIC SCHOOLS
√ 005417904	JJK CA578935	80240	30720	49520		ASPIRE PUBLIC SCHOOLS
~ 005417905	JJK CA578935	76440	30860	45580		ASPIRE PUBLIC SCHOOLS
√ 005417916	JJK CA578935	82880	34040	48840		ASPIRE PUBLIC SCHOOLS
######## 25:4	8:00					PAGE 2
Arr.Date Manifest	Profile	RCV Gross	RCV Tare	RCV Net	Net Tons	Gen. Name
		Weight	Weight	Weight		
12/30/2009-005417917	JJK CA578935	83660	34520	49140	24.57	ASPIRE PUBLIC SCHOOLS
<i>√</i> 005417918	JJK CA578935	84260	33180	51080		ASPIRE PUBLIC SCHOOLS
	JJK CA578935	78020	31420	46600		ASPIRE PUBLIC SCHOOLS
	JJK CA578935	88000	32500	55500		ASPIRE PUBLIC SCHOOLS
	JJK CA578935	88380	32300	56080		ASPIRE PUBLIC SCHOOLS
	JJK CA578935	79040	31780	47260		ASPIRE PUBLIC SCHOOLS
	JJK CA578935	79840	30580	49260		ASPIRE PUBLIC SCHOOLS
	JJK CA578935	80660	30040	50620		ASPIRE PUBLIC SCHOOLS
	JJK CA578935	78840	32220	46620		ASPIRE PUBLIC SCHOOLS
	JJK CA578935	78260	32980	45280		ASPIRE PUBLIC SCHOOLS
TOTAL				694140	347.07	
COUNT	14					
Total Documents	:					
TOTAL				1937620	968.81	
COUNT	40					
*** END OF REP	O RT ***					

Hnn V Bayler 16. International Shipments Import to U.S. Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.:	Month Marker Ma	Plea	e print or type. (Form designed for use on elite (12-pitch) typewriter.)						m Approved.	OMB No. 20	050-003
Contractor's Stand and Marine Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's Standa Address Contractor's	Securitive Sum and options and additional information Septime Probable Selectors Septime Probable Selectors October 0. 09 44006 Discontinue Process October 0. 09 44006 Discontinue Process October 0. 09 44006 Discontinue Process October 0. 09 44006 Discontinue Process Discontinue Process October 0. 09 44006 Discontinue Process Discontinue Proces	\uparrow		2. Page 1 of 3. Em	ergency Respons	Phone				3 .1.1	K
Constitution Principle Constitution Constit	Consisting Process Consistency Name Consisten		5. Generator's Name and Mailing Address	Genera	tor's Site Address	(if different that	n mailing addre	ess)	302	<i>J</i> 00	1/
Constructive Company Name Franchistry Extra Description (including Proper Styping Series, Hazard Class, D. Namber Section of Properties (Company Name)	Conservative Company Name Transport Company Name Transport Company Name Transport Company Name Transport Company Name Transport Company Name Transport Company Name U.S. EPIN D Number	Ш			1009	7 66th	Avenue	6			
Separation Company Name Separation S	SERAD Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number U.S. EPA D Number ST. S. T. O'Ld S. V. V. A. 73.2.5.7 C.S. T. O'Ld S. V. V. V. A. 73.2.5.7 C.S. T. O'Ld S. V. V. V. A. 73.2.5.7 C.S. T. O'Ld S. V. V. V. A. 73.2.5.7 C.S. T. O'Ld S. V. V. V. A. 73.2.5.7 C.S. T. O'Ld S. V. V. V. V. A. 73.2.5.7 C.S. T. O'Ld S. V. V. V. V. V. V. V. V. V. V. V. V. V.	\parallel	Colle - of Guer	1	Oak	land Cl	4				
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8. Designated Facility None and Sile Address Kelf Lennan 1411s (Waste mounting empact) 3.52.51 Cold Skylinia Casal Kelf Lennan City, CA 932.37 (559) 386 - 6200 CATOOCOCYG Lestifus Phone Sile Strong Strong Strong Strong Strong Number Hazard Class, ID Number, 10. Outsiders 11. Total 12. Unit 13. Waste Codes 14. Containers 11. Total 12. Unit 13. Waste Codes 14. Containers 14. Total 14. Special Handling Institutions and Additional Information WM 760L C A 578935 14. Special Handling Institutions and Additional Information WM 760L C A 578935 15. GENERATOR'S CERTIFICATION: 1 hereby declare that the contents of this consignation and Information to WM 760L C A 578935 15. GENERATOR'S CERTIFICATION: 1 hereby declare that the contents of this consignation and all behaviory commental and substance of the contents of this consignation of the Containers of the Containers 15. GENERATOR'S CERTIFICATION: 1 hereby declare that the contents of the containers of the containers of the content	8. Designated Facility Name and Size Address **Ref Herna** Wills (Locale managerness) S. EPRIL Namber **Ref Herna** Wills (Locale managerness) S. EPRIL Namber S. S. S. Orl of Skylinia (Cons.) Facility's Place: Ref Herna** Wills (Locale managerness) S. S. S. Orl of Skylinia (Cons.) S. S. S. S. Orl of Skylinia (Cons.) S. B. S. S. Dor Descripton (noturing Proper Skylinia Name, Housed Glass, D. Namber. **No. Type Constitution** 11. Total 12. Util 13. Washo Cons. The Second Constitution of Second Constitution** 11. Total 12. Util 13. Washo Cons. The Second Constitution of Second Const		18 TRUCKING						on Id	38.	ラぐー
Kell Roman, Hrits (Lusable mercangement) SSCHOLLING ROMAN Security Roman Security Residence Security Reside	Reflection Intelligence (Particle Control Cont	Ш	7. Transporter 2 Company Name				U.S. EPA ID	Number	50 11		- 13
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Facility's Prient: Rehiteman City, CA 73237 (557)386-6200 CATOOOGYGUE CATOOOGYGUU CATO	Security Priories KeHleman City, CA 93237 (SS9)386-6200 C370004/6	\parallel	Kettleman Hills (waste management	+)			U.S. EPA ID	Number			
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	5. Generator's Name and Mailling Address ASPINE Public School 1001, Zzna Ave, Sui	015 100	Genera	ator's Site Address	(if different the	han mailing addre	ess)			
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	5.	Generator's Name and Mailing Address ASPINE TUBLIC SCHOPLS 1001 2211 Avenue Swite 100 001Kland, CA. 94606 (510)424 5100	Gener	ator's Site Addre	ss (if different th	nan mailing addre	ess)		0011
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듾	IOD. F	Alternate Facility (or Generator)				U.S. EPA ID Nu	mber		
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Ť		FORM HAZARDOUS ASTE MANIFEST	1. Generator ID Nun	nber 62647 4	2778 2	2. Page 1 of	1 .	ergency Response		-1 \cap \cap	t Tracking N	19829	JJ	K
l			g Address	.10	<u> </u>	<u> </u>	Genera	tor's Site Address	(if different th	nan mailing addr	ess)	0020	00	
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	i i					<i>γ</i>	200			<u> </u>	ATI	2006	46	
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	Facili	settle man	Skylin City, C	astemana 2 Rdad 493239	(559)	384-	(47 DA		6.4	(1 0	0064	bu9	t
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	ı	certify that the waste minimator's/Offeror's Printed/Type	ization statemer	t identified in 40 CFR 262.2	rns or the attached El 7(a) (if I am a large qu	PAACKnowledgment Jantity generator) or Signature	of Consent. (b) (if I am a sma	II quantity ger	nerator) is true.		Mart	5	
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É ↑	18. Dis	crepancy						 					
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		's Phone: gnature of Alternate Facility	(or Generator)			-W					Mont	n Day	Year
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	0. Des rinted/	ignated Facility Owner or C Typed Name	perator: Certifica	tion of receipt of hazardous	materials covered by	the manifest except	as noted in Item	18a			Month	Day	Vace
lΙ		3700-22 (Rev. 3-05) Pre	mee.	Varoxa			-XW	mIQ.	1)pr	ela		1119	

21	nee ne start was (Form decigned for use on alite (12 nitch) funguritor)					For	· Approved (MR No. 2	050.0030
-lea	UNIFORM HAZARDOUS 1. Generator ID Number 2. Page 1 WASTE MANIFEST 4. Generator ID Number 7.78 2. Page 1	- 1	ergency Respons			t Tracking N	n Approved. (lumber 9831		
	5. Generator's Name and Mailing Address ASPIVE PUBLIC SCHOOLS 1001 22M AND SWIFE LOO OAKLAND, CA. MILLOO (510) 434.5100 Generator's Phone:	Generat	or's Site Address 09 UUT .Klama	(if different t	han mailing addr	ess)	<u> </u>		:
	6. Transporter 1 Company Name 7. Transporter 2 Company Name				U.S. EPA ID	Love	0P) c	572	2
	· · · · ·								
	8. Designated Facility Name and Site Address Ketheman thus Chaste 1 35251 DIDSKYLLINE ROAD Ketheman City CA. 93239 Facility's Phone: (559) 384 - 4200	uahag	ement)			r 608	6464		7
	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, HM and Packing Group (if any))		10. Conta No.	iners Type	11. Total Quantity	12. Unit Wt./Vol.	1	aste Codes	7.
GENERATOR	1. P.D. Environmentally thracelous Substance, sotid, 1 (Polychlormoled Biphenyls) (Soul Impacked with	4.09	BAN				261	m	
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	4.								
	14. Special Handling Instructions and Additional Information								
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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignm marked and labeled/placarded, and are in all respects in proper condition for transport according to a Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Ack I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity	ent are fully a pplicable inte nowledgmen	and accurately de emational and nat t of Consent.	escribed abov tional governi	e by the proper s mental regulation	hipping лат			
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TRANSI	Transporter 2 Printed/Typed Name	Signature					Mônti	n Day	Year
	18. Discrepancy Indication Space Quantity Type		Residue	News	Partial Re	ejection		Full Rejec	ction
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DESIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator)	·					Mon	th Day	Year
- DESK	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disp	oosal, and rec 3.	cycling systems)	<u> </u>	4.				
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the materials Cover	nanifest exce Signature	pt as noted in Ite	m 18a	MOD	(L)	Mont	h Day	Year 109
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	5. Generator's Name and Mailing Address ASPINE PUBLIC SCHOOLS WOI ZENDER AND SCHOOLS OF LUNC A THORE 510.434.5100	Generator's Site		rent thar	n mailing addres		000		
	€ Transporter 1 Company Name	3929			U.S. EPA ID N	AR C	000 19	306	70
	8. Designated Facility Name and Site Address Kettleman thils Waste Management 35251 old Skyline Road Kettleman Gty, CA. 93239 (559)3866 Facility's Phone:	-4200				TO	006		/7
	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10 N	o. Containers	ре	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Code	s
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	4. 14. Special Handling Instructions and Additional Information				•				
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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment marked and labeled/placarded, and are in all respects in proper condition for transport according to applie Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknow I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generated to the content of the certification of the	cable international ledgment of Coris erator) or (b) (if I a	and national go ent.	vemmer	ntal regulations.	pping nam If export sh	ipment and I	am the Prima	ary
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SNATED	18c. Signature of Alternate Facility (or Generator)						Мо	nth Day	Year
– Desi	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal 1. 2. 3.	, and recycling sy	stems)	-	4.				
\	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the market Printed/Typed Name Sign	- } - '	ed in Item 18a) (N	ola	•	Mor	ith Day	Year
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1	UNIFORM HAZARDOUS WASTE MANIFEST CACOOZUY 748	2. Page 1 of 3. Eme	-552-	1212	4. Manifest	629	983	3 J .	JK
	5. Generator's Name and Mailing Address #Spire Public Schools LOOI ZEND AND NUL OAK-JAND CA 94400 (50) 434-510 Generator's Phone:	Genera	tor's Site Address	(if different th	an mailing addre N Aver				
	Generator's Phone: 6. Transporter 1 Company Name 18 Thurking	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		·	U.S. EPA ID	Number	8201	150	
	7. Transporter 2 Company Name				U.S. EPA ID I	Number	0001	45E	373
	8. Designated Facility Name and Site Address FETTEMAN HUS CWASTE MANUSCHE	nt)			U.S. EPA ID I	Number			
	8. Designated Facility Name and Site Address Fettleman Huls Cwaste Management 35251 old But Skyline Ruad Fettleman City, CA. 93239 (559) Facility's Phone:)386·62	00			•	864 064		F
	9a. HM 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	HIM and Packing Group (if any)) No.							
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GENERATOR	2 RO, Edviconnes tally hazardous subs	PAN					26		
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	14. Special Handling Instructions and Additional Information		e		÷				
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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this marked and labeled/placarded, and are in all respects in proper condition for transport acc Exporter, I certify that the contents of this consignment conform to the terms of the attached I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large.)	ipping name If export sh	ipment and I a	m the Prima	iry				
<u> </u>	Generator's/Offerors Printed/Typed Name 16. International Shipments	Signature	Any	2 Va	Bav	ler	Moni V/	th Day 8	Year V G
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ORTER	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name	Signature	211	(2)		,	Mont	h Day	Year
TRANSPORTER	Transporter 2 Printed/Typed Name	Signature	en,				Mont	h Day	Year
<u>-</u> ↑	18. Discrepancy 18a. Discrepancy Indication Space				()				<u> </u>
	Quantity Type	L.	I Residue anifest Reference	Mumher	Partial Reje	ection	L] Full Rejec	tion
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	1. 2 H137	3.			4.				
	20. Designated Facility Owner or Operator: Certification of receipt of hardrous materials covered Printed/Typed Name	ed by the manifest excep Signature	t as noted in Item	18a	\triangle		Mon	h Day	Year
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 	UNIFORM HAZARDOUS 1. Generator ID Number CAC 00ZLe+748 78	2. Page 1 of 3. Em	nergency Respons		4. Manifest	t Tracking N			JK
	5. Generator's Name and Mailing Address ASINE Public Schools 1001 12 nd Avenue, Swite 100 00 12 nd Ave	Genera	rator's Site Address 1009 (J Oa.Klau	s (if different th	han mailing addre	ess)			<u> </u>
	6. Transporter 1 Company Name 7. Transporter 2 Company Name			(U.S. EPAID	2019	1037	12	
					U.S. EPA ID I				
	8. Designated Facility Name and Site Address Kettleman thills (Waste Management 3525) old Skyline food Kettleman City, CA 93239 Facility's Phone:	わ			U.S. EPA ID I		~ <u>~!!</u>	1.11/	<u> </u>
	Facility's Phone: 9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Numl		4201	5		4T0	2006	946	セ 112
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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of marked and labeled/placarded, and are in all respects in proper condition for transport Exporter, I certify that the contents of this consignment conform to the terms of the atta I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a	rt according to applicable inte tached EPA Acknowledgmen a large quantity generator) o	ternational and mati at of Consent.	tional governm	nental regulations.	ipping name	e, and are clas ipment and I a	ssified, pack am the Prima	aged, ary
1	Generator's/Offeror's Printed/Typed Name An N . BA II FR 16. International Shipments	Signature	an	1 VE	za no	2/	Mon	nth Day // / 8	309
Ξ	Transporter signature (for exports only):	Export from U.S.	Port of en						
	17. Transporter Acknowledgment of Receipt of Materials Cansporter 1 Printed/Typed Name	Signature	}				Mon	nth Day	Year
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1 1	18. Discrepancy 18a. Discrepancy Indication Space								<u> </u>
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NAIED	Facility's Phone: 18c. Signature of Alternate Facility (or Generator)				<u> </u>		Mor	nth Day	Year
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	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials cov	overed by the manifest excep	ot as noted in Item	18a	$\overline{}$		Mon	ith Day	Year
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			gned for use on elite (12-pitch) t	<u>, , </u>							OMB No. 20	050-003
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- 1	5.	Generator's Name and Mailir	ng Address	12 Se KIPI.	Genera	- 967-17 tor's Site Address	s (if different tha	an mailing addre	ess)	W W GES		
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11	Ë	Exporter, I certify that the co	eu, and are in all respects in p ntents of this consignment cor	roper condition for transport according to the terms of the attached	rding to applica FPA Acknowle	ible internat dament of (onal and nati Consent	onal governme	ental regulations.	if export shi	pment and I am	the Primar	ry
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20	. Desi	ignated Facility Owner or Op	perator: Certification of receipt	of hazardous materials covered	by the manifest	except as	noted in Item	18a					
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П	5. Generator's Name and Mail	L		0-987-1788		3411	<u> 1900 J</u>	<u>JK</u>
	Asphe Public School	793	Gene	rator's Site Address (if differe	nt than mailing add	ress)		
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	marked and labeled/placan	ded, and are in all respects in proper condition to contents of this consignment conform to the term	or transport according to applicable into	emational and national gover	nmental regulations	. If export shipm	ent and I am the Prima	ary
1	I certify that the waste mini	imization statement identified in 40 CFR 262.27	is of the attached EPA Acknowledgmen (a) (if I am a large quantity generator) o	t of Consent. r (b) (if I am a small quantity)	generator) is true.			
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	20. Designated Facility Owner or	Operator: Certification of receipt of hazardous r	naterials covered by the manifest exce	ot as noted in Item 18a				
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SI	Transp	orter 2 Printed/Typed Nam	ie			Signat	ure	77	· · · · · · · · · · · · · · · · · · ·			Month	Daý	Year [{]
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۲	10h A1	ternate Facility (or General	torl				Manifest F	сетегелсе	Number:	U.S. EPA ID I	Number			
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띩		's Phone:										1 Manth	Day	Voor
삗	18c. Si	gnature of Alternate Facility	y (or Generator)									Month	Day	Year
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DESIGNATED FACILITY	19. Ha	zardous Waste Report Mar	nagement Method (Codes (i.e., codes for hazardou	us waste treatme	ent, disposal, a	nd recycling s	/stems)						
띪	1.			2.		3.				4.				
_														
$\ \ $	20. Des	signated Facility Owner or	Operator: Certificat	tion of receipt of hazardous ma	aterials covered t	by the manifest	t except as no	ed in Item	18a					
		Typed Name	,			Signat						Month	Day	Year
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-	ease print or type. (Form designed		witter.)						Approved. OMB	No. 2050-003
14	I ONIFORM HAZARDOUS	Generator ID Number		2. Page 1 of 3. En	nergency Respo	onse Phone .	4. Manifes	t Tracking Nun	nber	
	WASTE MANIFEST	CAD002647778		1 51	3-5457-1786		100	541/	927	JJK
П	5. Generator's Name and Mailing Ad	ddress				ess (if different t	han mailing addr	ess)		
П	Asphe Public School 1904 22/10 Ave., See 10	turo.			1009 66th.		-	•		
П	Castana CA 30006	(N)			oakiand, C		75 15 A			
П	Generator's Phone: 510 434	(CSeSC)		ı	erice to a trade color 1 with	. 5407E 1 .747	iore Carrery			
Н	6. Transporter 1 Company Name	T8487								
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П	73		1499				K	CCC	11/17/18	16
П	7. Transporter 2 Company Name						U.S. EPA ID	Number		
Ш										
П	Designated Facility Name and Sit Charling at 1974 and 197	le Address					U.S. EPA ID	Number		
П	35251 Old Skyline Road						CAT	EEEEE 45 117		
Н	Kententan City, CA 932									
Ш	Facility's Phone: 209-365-2711	····· ~	•				1			
П						· · · · · · · · · · · · · · · · · · ·				
П		ncluding Proper Shipping Name, Haz	ard Class, ID Number	;	10. Con	tainers	11. Total	12. Unit	13. Waste C	`odec
П	HM and Packing Group (if any))				No.	Туре	Quantity	Wt./Vol.	IS. Waste C	oues
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1	14. Special Handling Instructions and									
1	Wear proper PPE when h	renderal maste								
	Profile CAS78935									
ı										
١	15. GENERATOR'S/OFFEROR'S C	ERTIFICATION: I hereby declare the	nat the contents of this	s consignment are fully a	and accurately d	escribed above	by the proper sh	ipping name, ar	nd are classified, pa	ackaged,
	marked and labeled/placarded, a	and are in all respects in proper cond ats of this consignment conform to the	dition for transport acc	ording to applicable inte	mational and na	ational governme	ental regulations.	. If export shipm	ent and I am the P	rimary
ı	I certify that the waste minimizat	tion statement identified in 40 CFR 26	e terms or trie attache 62.27(a) (if Lam a lam	e cuantity denerator) or	of Consent. (b) (if Lam a sm	nali quantity gen	erator) is true			
۱	Generator's/Offeror's Printed/Typed N		oz.z. (a) (ii i aiti a iaiç	Signature	(b) (ii i dili a sii	ian quantity gon	crator, is true.		Month E	Day Year
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Ĕ	16. International Shipments	Import to U.S.	1	Export from U.S.	Port of e	ntry/exit:				
	Transporter signature (for exports only	· · · · · · · · · · · · · · · · · · ·			Date leav	ving U.S.:				
띪	17. Transporter Acknowledgment of Re	eceipt of Materials								
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ŝ	Transporter 2 Printed/Typed Name		San Australia	Signature	- Assertation Asserts of				Month D	ay Year
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	18a. Discrepancy Indication Space	Quantity	LТуре	L	Residue		Partial Reje	ection	L Full F	Rejection
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IJ				Ma	nifest Referenc	e Number:				
ΣΙ	18b. Alternate Facility (or Generator)						U.S. EPA ID N	umber		
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ED FACILITY	Facility's Phone:						1			
ام	18c. Signature of Alternate Facility (or 0	Generator)							Month C	Day Year
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ESIGNA	19. Hazardous Waste Report Managen		azardous waste treat		cling systems)					
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$\ \ $	20. Designated Facility Owner or Opera	ator: Certification of receipt of hazard	lous materials covere	d by the manifest excen	t as noted in Ite	m 18a				i
1 L	20. Designated Facility Owner or Opera Printed/Typed Name	ator: Certification of receipt of hazard	lous materials covere	d by the manifest excep Signature	t as noted in Ite	m 18a			Month Da	ay Year

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1		FORM HAZARDOUS ASTE MANIFEST	1. Generator ID N			2. Page 1 of	3. Emergency		se Phone	4. Manifes	Tracking N	^{umber} 7928	JJ	ΙK
		enerator's Name and Mailin					Generator's Sit	e Addres	-					
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П		erator's Phone:								U.S. EPA ID	Number			
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	7. Tra	nsporter 2 Company Nam	е							U.S. EPA ID				
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Ш	幺	efflenian Cay, CA s	33239											
Ш	Facili	ty's Phone: 202-386-97	11							1				
Ш	9a.	9b. U.S. DOT Description	on (including Prope	r Shipping Name, Hazar	d Class, ID Number,		1	0. Contai	ners	11. Total	12. Unit	13. W	aste Codes	
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Ш	£27	odie CA578935												
	15. C	GENERATOR'S/OFFEROR	'S CERTIFICATIO	N: I hereby declare that	the contents of this	consignment ar	e fully and accu	rately des	scribed above	by the proper sh	nipping name	, and are classif	ied, packag	ged,
	n	narked and labeled/placard Exporter, I certify that the co	led, and are in all r	espects in proper conditi	on for transport acco	rding to applica	ble international	and natio						
	1	certify that the waste minir	nization statement			quantity gener	ator) or (b) (if I a		ll quantity gen	erator) is true.				
	Gener	ator's/Offeror's Printed/Typ	ed Name	port grant the		Signa I	iture					Month	Day	Year I
∀	16. Into	ernational Shipments	, ,			<u> </u>	, Sagar S		la davite			1 4-7	* \$	3
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SIGNATI		gnature of Alternate Facility zardous Waste Report Mar	agement Method	Codes (i.e., codes for ha	zardous waste treatm	nent, disposal, a	and recycling sy	stems)				i	<u> </u>	
DESIGNATED FACILITY			agement Method (Codes (i.e., codes for haz	zardous waste treatm	nent, disposal, a	and recycling sy	stems)		4.		<u> </u>		
ار	19. Haz 1.	zardous Waste Report Mar		2.		3.			199	4.				
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5. 0	Generator's Name and Mailir	CACCEDE 47779		1 1	510-967-176	8		1521	7929	_
11 -	Aspire Public School				Generator's Site Ad	dress (if different	than mailing ac	idress)	and the first transition	
Π	1001 2250 Ave Sie Oakland Ca 20535	7(30)			1009 850	3 FAVE		·		
Gen	nerator's Phone:	to dispression			Oskiani,	C4 94601-3	536 USA			
6. Ti	nerator's Phone: 10-d ransporter 1 Company,Name	e		·l						
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7. Tr	ransporter 2 Company Name)	3				10	APC	mo 141	4 P
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Facilit	ty's Phone: 💥 😘 😘 🤫 1	}								
9a.	9b. U.S. DOT Description	(including Proper Shipping Nam	ne. Hazard Class ID Number							
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[۵	Facil	ity's Phone:								1				
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	1.			2.		3.				4.				
		esignated Facility Owner or O	perator: Certificati	on of receipt of hazard	ous materials covered b	y the manifest	except as no	ted in Item	18a					
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	!	marked and labeled/placard	ded, and are in all re	spects in proper con	dition for transport a	cording to applicable i	nternational and nat	ional govemm	ental regulations.	If export ship	ment and I am th	ne Primary
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	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Contain No.	ers Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Code	s
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_	18. Discre	pancy										
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	5. Generator's Name and Mailing Address ASPINE Public Schools	Gen	erator's Site Address	s (if different t		ess)		
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	Fransporter 1 Company Name TRUCKING				U.S. EPAID		00143 €	375
	7. Transporter 2 Company Name				U.S. EPA ID	Number		
	8. Designated Facility Name and Site Address Kettiman Hills C Waste Managem 35251 old Skyline Road Kettleman City CA, 93239	nent)			U.S. EPA ID	Number		
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	5. Generator's Name and Mailing Address ASPINE TUBLIC SCHOP IS 1001 Zand Avenu Swite 100 0014 Land CA. 94606 (510) 4221	Gene	rator's Site Addres	s (if different t	han mailing addre	ess)	<u> </u>	JOIX
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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the commarked and labeled/placarded, and are in all respects in proper condition for the terms of this consignment conform to the terms of the terms of the contents.	ontents of this consignment are fully transport according to applicable into the attached EPA Asknowledgment the attached EPA Asknowledgment to the attached	and accurately desemational and national	scribed above onal governm	by the proper shi ental regulations.		, and are classifie prient and I am th	d, packaged, ne Primary
	I certify that the waste minimization statement identified in 40 CFR 262.27(a) (Generator's/Offeror's Printed/Typed Name AM AM AM AM AM AM AM AM AM A	(if I am a large quantity generator) of Signature	1	. 100			Month	Day Year
ᄓ	16. International Shipments Import to U.S.	Export from U.S.	Port of ent	ry/exit:	enn			1809
	Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name		Date leavir	ng U.S.:	•			
욁	Transporter 2 Printed/Typed Name	Signature	7		£		Month	Day Year 20 9
	18. Discrepancy	Signature					Mònth	Day Year
<i>!</i>	8a. Discrepancy Indication Space	Туре [Residue		Partial Reje	ction	F	ull Rejection
	8b. Altemate Facility (or Generator)		anifest Reference	Number:	U.S. EPA ID Nu	ımher		
<u> </u>	acility's Phone:				I	inibol		
<u> </u>	8c. Signature of Alternate Facility (or Generator)		•				Month	Day Year
	9. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous	s waste treatment, disposal, and rec	ycling systems)		4.			· · ·
2	D. Designated Facility Owner or Operator: Certification of receipt of pazardous mate	erials covered by the manifest excep	t as noted in Item	18a 🚶		1		
	inted/Typed Name Single Acids	Signature	2	1	1		Month	Day Year
A F	orm 8700-22 (Rev. 3-05) Previous editions are obsolete.	DESIGN	ATED FAC	ILITY TO	DESTINA	TION S	TATE (IF F	REQUIRED)

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		WASTE MANIFEST CACOO 244748	of 3. Emergency Response	-1212	00	1 Tracking N		
		5. Generator's Name and Mailing Address #Spire Public Schools Lool-Zend Avenue Generator's Phone: 6. Transporter 1 Company Name			n Aver CA	nie		
		7. Transporter 2 Company Name			U.S. EPA ID	1-R	6 00 i	4387
					U.S. EPA ID			
		8. Designated Facility Name and Site Address Kettleman Huls (Waste Management) 35251 old But Skyline Ruad Fettleman City, CA. 93239 (559) 386			U.S. EPA ID	_	الديم	110
	ŀ	Facility's Phone: (559) 384	·6200			-	364 064	
	1	9a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Conta No.	iners Type	11. Total Quantity	12. Unit Wt./Vol.	13. V	Vaste Codes
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GFNF	; ; ;	2 RQ Edvicornes tally hazardons substances × solid, N.O. E., Coolych lock white Espheryly);	(A)				26	
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		4. Special Handling Instructions and Additional Information WM Profile: CA 578935 9E 2	11-18-09 4034	. '	3680	•		,
	It	marked and labeled/placarded, and are in all respects in proper condition for transport according to appl Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknov I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity get	icable international and nat viedoment of Consent	onal governme	ental regulations.	ipping name If export shi	pment and I ar	n the Primary
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<u>-</u>	18	Discrepancy						<u> </u>
	18	a. Discrepancy Indication Space Quantity Type	Residue		Partial Reje	ction		Full Rejection
FACILITY .	18	b. Alternate Facility (or Generator)	Manifest Reference	Number:	U.S. EPA ID No	ımber		
D FAC	_	cility's Phone:						
Ι¥		c. Signature of Alternate Facility (or Generator)					Month	n Day Year
DESIC	19. 1.	Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal 2. 3.	, and recycling systems)		4.			
$\ \cdot\ $	20.	Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manif	and average on petrol in the	10-				
	Prir		est except as noted in Item nature	108		·	Month	Day Year
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1	UNIFORM HAZARDOUS WASTE MANIFEST CAC 602Le4748	2. Page 1 of 3. Em	nergency Respons		4. Manifest	t Tracking N		·	
	5. Generator's Name and Mailing Address ASURE PUBLIC SCHOOLS. 1001 12 nd Avenue, Stute 100 ONLIAND. CAT. ONLIAND. Generator's Prone: 6. Topografia 16.	Genera	ator's Site Address	is (if different the	han mailing addres Avenu A	ess)			
	6. Transporter 1 Company Name 7. Transporter 2 Company Name			(U.S. EPAID N CALOU U.S. EPAID N		1037	12	
		3							
	8. Designated Facility Name and Site Address Kettleman Hills (Waste Management) 35251 old Skyline Rad Kettleman City, CA. 93239 Facility's Phone: (S)			U.S. EPAID N		~~!!!	1.11	-
			-4201	<u> </u>		+00 2TO	0006	946	r / <u>/ 7</u>
	9a. HM 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Contai No.	ainers Type	11. Total Quantity	12. Unit Wt./Vol.	13.1	Waste Codes	
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- GENE	NA3027, W	interfaces,	001	PT	018	Y	261		
	3.								
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	14. Special Handling Instructions and Additional Information		<u>L</u>	<u></u>	<u></u>				
	WM frofile: CA 578935 05 da	ete 11-18	-09		•	'	71 18		
	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this marked and labeled/placarded, and are in all respects in proper condition for transport according Exporter, I certify that the contents of this consignment conform to the terms of the attached I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large.)	cording to applicable inte ed EPA Acknowledgmen	ernational and nati nt of Consent.	tional governme	nental regulations.	ipping name If export shi	e, and are clas ipment and I a	sified, packa am the Prima	iged, ary
ļ	Generator's/Offeror's Printed/Typed Name Ann V. BAWER	Signature	an	·	Bane		Mon	nth Day	09
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RANSPO	Transporter 2 Printed/Typed-Name	Signature	NX_	<u> </u>			<i>ll</i> Mont	130) <i>09</i> Year
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	18a. Discrepancy Indication Space Quantity Type		Residue	Mumber:	Partial Reje	ection		Full Rejec	ction
릵	18b. Alternate Facility (or Generator) . Facility's Phone:		IIIIIGALI VOIG	Number.	U.S. EPA ID NU	umber			
NA ED	18c. Signature of Alternate Facility (or Generator)	-					Mon	nth Day	Year
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatm 1. 2. 2.	3.			4.				
i i	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered Printed/Typed Name	ed by the manifest excep	t as noted in Item	18a			Mont	th Day	المُحْلِينَ الْمُ

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			1001 22	NA AVERTA	ite 100		Oak	land,	CA		
	Gener	rator's Phone: 510 -	434-5700 O	Eland, CA	94606						
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Н	Facilit	y's Phone: 559-3				<u>93239</u>		1 CAT	0036	46 1	4
	9a.	9b. U.S. DOT Description and Packing Group (if a		g Name, Hazard Class, ID N	ımber,		Containers	11. Total Quantity	12. Unit Wt./Vol.	13. Waste C	odes
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	15. (GENERATOR'S/OFFERO	R'S CERTIFICATION: I he	rebỳ declare that the content	s of this consignmen	are fully and accura	tely described above	by the proper sh	ipping name, and	d are classified, p	ackaged,
	n F	nårked and labeled/placa Exòorter. I certify that the	rded, and are in all respects contents of this consignmen	in proper condition for transp t conform to the terms of the	oort according to app attached EPA Ackno	icable international a viedgment of Conser	nd national goveπme nt.	ental regulations.	If export shipme	ent and I am the F	rimary
	1	certify that the waste min	imization statement identific	ed in 40 CFR 262,27(a) (if I a	n a large quantity ge	nerator) or (b) (if I am		erator) is true.		Mandh	
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	5.0	Generator's Name and Maili ノのの1	7 / N/I /	,	1 2 .	1)	Generator's Si	ite Address (if different the	an mailing addre 7 66	\$9 x	1 ne		•
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	6.	ransporter 1 Company Nan	ne	KIN	_					U.S. EPAID	Number		D38	, Z &
	1	ransporter 2 Company Nan	ne							U.S. EPAID I	Vumber		<i></i>	
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	Fac	Designated Facility Name ar	826-620	Hlen	an Hills,	CA 032	39					900 (864 (17
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	5. Generator's Name and Mailing Address A Salage Pu	Strick Cohnell Gene	0-967-1786 rator's Site Address (if different t	nan mailing address)	20TO JOK
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	9a. 9b. U.S. DOT Description (including Proper Shipping Nat HM and Packing Group (if any))	me, Hazard Class, ID Number,	10. Containers No. Type	11. Total 12. Unit Quantity Wt./Vol.	13. Waste Codes
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	14. Special Handling Instructions and Additional Information		1 1 0 5		
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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby of	declare that the contents of this consignment are full			e, and are classified, packaged.
	marked and labeled/placarded, and are in all respects in pro Exporter, I certify that the contents of this consignment conf	pper condition for transport according to applicable in	ntemational and national governo	nental regulations. If export sh	ipment and I am the Primary
.	I certify that the waste minimization statement identified in 4	0 CFR 262.27(a) (if I am a large quantity generator)	or (b) (if I am a small quantity ge	nerator) is true.	
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	18c. Signature of Alternate Facility (or Generator)			<u> </u>	Month Day Year
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	20. Designated Facility Owner or Operator: Certification of receipt	of hazardous materials covered by the manifest ex	cept as noted in Item 18a		
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	5. G	enerator's Name and Mailir くさの / ス	CACODZGYZ ng Address Aspirac Pu 2 ~ 1 Ave , Sn	blic Schools	Genera	tor's Site Addres	s (if different th	nan mailing addre	ss)			
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		esignated Facility Owner o	or Operator: Certifica	ation of receipt of I	hazardous materials	covered by the	manifest excer	ot as noted in Item	1 18a					
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	5.	Generator's Name and Mailin		<u> </u>	Generato	r's Site Address	(if different tha	n mailing addre	ss)			
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	Fa	acility's Phone: 309-385-97	19									
		a. 9b. U.S. DOT Description and Packing Group (if a	on (including Proper Shipping Name, Hazard Class, ID Number, ny))	1		10. Contair No.	ners Type	11, Total Quantity	12. Unit Wt./Vol.	13. V	/aste Cod	es
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1		Exporter, I certify that the c	ontents of this consignment conform to the terms of the attach mization statement identified in 40 CFR 262.27(a) (if I am a lar	ed EPA Acknow	ledgment	of Consent.		_	,	•		
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DESIGNATED FACILITY	180	c. Signature of Alternate Facili	ty (or Generator)							Mon	th Da	y Year
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	UNIFORM HAZARDOUS 1. Generator ID Number QACQGSS47778	2. Page 1 of 3. En	nergency Response 0-957-1785	Phone		Tracking Nur	7901	JJK
$\ \ $	5. Generator's Name and Mailing Address	Gener	ator's Site Address	(if different tha	n mailing addre	ess)		
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Ш	Generator's Phone: 510-464-5000					AR I	000/9	10 997
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	7. Transporter 2 Company Name	1 X 2- 01			U.S. EPA ID	Number	•	
	8. Designated Facility Name and Site Address	Kitt	The state of the s		LLO EDAID	VI		
					U.S. EPAID	Number 2005–3117		
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	Exporter, I certify that the contents of this consignment conform to the terms of the atta	ached EPA Acknowledgme	ent of Consent.		_	i ii export sinp	mone and ream a	io i milary .
	I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a Generator's/Offeror's Printed/Typed Name	large quantity generator) Signature	or (b) (if I am a sma	il quantity gen	erator) is true.		Month	Day Year
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	18c. Signature of Alternate Facility (or Generator)						Month	Day Year
DESIGNATED FACILITY								[
<u>8</u>	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste	treatment, disposal, and re	ecycling systems)					
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	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials co Printed/Types Name		ept as noted in Item	182	A		14. 11	Day V
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Please print or type. (Form designed for use on elite (12-pitch) typewriter. Form'Approved. OMB No. 2050-0039 UNIFORM HAZARDOUS 1. Generator ID Number 4. Manifest Tracking Number 2. Page 1 of 3. Emergency Response Phone 005417931 **WASTE MANIFEST** 5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address) Aspire Public School 1003 6518 Ave. Oskispo, CA 21521-3635 USA 1001 3213 A.E. Bis. 100 Oskisno, OA 37505 Generator's Phone: 6. Transported 1 Company Name 8. Designated Facility Name and Site Address U.S. EPA ID Number CATUCO645117 28881 Old Bayline Ross Kawisman Chy, CA 93730 Facility's Phone: 209-255-271 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 9a. 11. Total 12. Unit 13. Waste Codes and Packing Group (if any)) НМ No. Type Quantity Wt./Vol. ÷ PC. Enthrougheit coreduce subsiduce, solid, n.O.S. (pc) phintress? Ui 261 GENERATOR bijnenjie), S. UNBOT. II 14. Special Handling Instructions and Additional Information Wasy propar PPE when handling wasta PME: CA576935 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper stupping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. l certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name Month Day Year 12 29 CG 16. International Shipments Import to U.S. Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S. 17. Transporter Acknowledgment of Receipt of Materials TRANSPORTER Transporter 1 Printed/Typed Name Signature Year Month Day 09 Transporter 2 Printed/Typed Name 18. Discrepancy 18a. Discrepancy Indication Space ∐ Type Residue Full Rejection Quantity → Partial Rejection Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) Facility's Phone: DESIGNATED 18c. Signature of Alternate Facility (or Generator) Month Day 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 20. Designated Facility Owner or Operator: Certification of receipt of hazardpus materials covered by the manifest except as noted in Item 18a Printed/Typed Nam Signature EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

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/11	1	5. GENERATOR'S/OFFEROR'S C	ERTIFICATION: Unereby declare that the co	intents of this consignment a	re fully and accura	toly described show	hi the mane	in-le		
11	I	Exporter, I certify that the conten	its of this consignment conform to the terms of	inansport according to applic of the attached EPA Acknowli	able international a	and national governm	nental regulations.	. If export ship	ornent and I am the	e Primary
Ш	Ľ	I certify that the waste minimizati	ion-statement identified in 40 CFR 262.27(a)	(if I am a large quantity gene	rator) or (b) (if I an	ni. n a smali quan tio ge	nerator) is true.			
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DESIGNATED FACILITY	19	. Hazardous Waste Report Managerr	nent Method Codes (i.e., codes for hazardous	waste treatment, disposal	and recycling syste	ems)				
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	20.	. Designated Facility Owner or Opera	ator: Certification of receipt of hazardous mate	erials covered by the manifes	st except as noted	in Item 18h				
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4		(and INCI	or exclume) I		- Je	Mol	<u> </u>	1/7	79,09
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	5. G	enerator's Name and Mailin หัวมีเร Public School	g Address				Generator	s Site Address	(if different th	an mailing addre	ess)			
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DESIGNATED FACILITY	19. Ha	zardous Waste Report Man	agement Method	Codes (i.e., codes fo	hazardous waste treat	tment, disposal,	and recycli	ng systems)		**				
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	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Numbe and Packing Group (if any))	er,	10. Conta	iners Type	11. Total Quantity	12. Unit Wt./Vol.	13. W	Vaste Code	es
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Form Approved. OMB No. 2050-0039 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 4. Manifest Tracking Number UNIFORM HAZARDOUS 1. Generator ID Number 3. Emergency Response Phone 2. Page 1 of JJK 0054 **WASTE MANIFEST** CACCECCS-1777 Generator's Site Address (if different than mailing address) 5. Generator's Name and Mailing Address Agrica Petric School 1001 (77th Ars., Sec. 100 OCB SSHAME Devisto DA SESSI-5355 USA OSTRAN CA 94536 510-434-8000 Generator's Phone: U.S. EPA ID Number 6. Transporter 1 Company Name $\mathcal{X}/\langle - \langle$ luc King U.S. EPA ID Numbe 7. Transporter 2 Company Name U.S. EPA ID Number 8. Designated Facility Name and Site Address Inc. CATCC0545117 5565: Old Skyllie Aced Kenteman Chis, CA 93938 Facility's Phone: 309-365-2711 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 12. Unit 11. Total √Waste Codes 9a. Quantity Wt./Vol. No. and Packing Group (if any)) Type HM AO, Environ manally horardous substance, sold, N.O.S. polycholmated violative, 8, 980077, $^{\rm H}$ 15 137 GENERATOR 14. Special Handling Instructions and Additional Information 25174 KB. Weer closes PPE voted hardling vaste PMILE (7/57)8935 OSD: 12/30/09 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/plácarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPAAcknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Day Month Generator's/Offeror's Printed/Typed Name 12 16. International Shipments Port of entry/exit: Import to U.S. Export from U.S. ż Date leaving U.S.: Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Materials Day Year Month Signature Transporter 1 Printed/Typed Name 12 Month Transporter 2 Printed/Typed Name 18. Discrepancy Full Rejection Partial Rejection 18a. Discrepancy Indication Space Residue Type Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) FACILITY Facility's Phone: Day Year DESIGNATED 18c. Signature of Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Month Day Printed/Typed Name

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

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囧	18c. S	ignature of Alternate Facili	ty (or Generator)							Мо	nth Da	ıy Year
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		signated Facility Owner or d/Typed Name	Operator: Certification of receipt of hazardor		fest except a	s noted in Item	18a	·		Moi	nth Da	y Year
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\uparrow	UNIFORM HAZARDOUS 1. Generator ID Number WASTE MANIFEST		3. Emergency	Response Phone		t Tracking N		JJK
Ш	5. Generator's Name and Mailing Address		জান এবস Congretoric Si	ৰত্ত্ত্ত te Address (if different th			1320	אנע
Ш	II Asolie Public School			e Address (il dilleterit ill 65th Ave.	an mainny addre	:88)		
Ш	1061 92nd Ave., Sie. 100 Gekland, CA is 335			70, CA 2 :571-35.	35 USA'			•
Ш	Generator's Phone: \$10-434-3000							
П	6. Transporter 1 Company Name				U.S. EPA ID	Númber		
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П	7. Transporter 2 Company Name		***	***	U.S. EPA ID			<u> </u>
Ш					1			
	8. Designated Facility Name and Site-Address		***************************************		U.S. EPA ID			
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П	Keitleman Gily, CA 93339	,						
$\ \ $	Facility's Phone: 509-363-9711		,					
Ш	ga. 9b. U.S. DOT Description (including Proper Shipping Nar	me, Hazard Class, ID Number,		10. Containers	11. Total	12. Unit	13. Wast	e Codes
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	14. Special Handling Instructions and Additional Information							
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П	 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby of marked and labeled/placarded, and are in all respects in pro 	declare that the contents of this consignment a	re fully and acc	curately described above	by the proper sh	nipping name	, and are classified	, packaged,
$\ \ $	Exporter, I certify that the contents of this consignment confi	orm to the terms of the attached EPA Acknowle	edament of Cor	sent.		. If export sn	ipment and t am th	e Pnmary
Ш	I certify that the waste minimization statement identified in 4 Generator's/Offeror's Printed/Typed Name		rator) or (b) (if I	am a small quantity gen	erator) is true.		18	
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<u>-</u>	16. International Shipments		/~~				12	30 09
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7	Facility's Phone:							
ATE	18c. Signature of Alternate Facility (or Generator)						Month	Day Year
DESIGNATED FACILITY	19. Hazardous Waste Report Management Method Codes (i.e., co	ndon for honordous words to stand and		· · · · · · · · · · · · · · · · · · ·				
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	20. Designated Facility Owner or Operator: Certification of receipt	of hazardous materials covered by the manife	st except as no	ted in Item 18a				
	Printed/Typed Name	Ranco Signa		0.0	/		Month	Day Year
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leas	se print or type. (Éc	orm desia	ned for use on elite (12-pitch) ty	pewriter.) ^{r.}						Form	Approved. O	MB No. 2	050-0039
_	UNIFORM HAZAI		Generator ID Number	<u> </u>	2. Page 1 of	3. Emerge	ency Response	e Phone	4. Manifest	Tracking Nu	mber フロロコ		
	WASTE MANIF		CAC002547778		1		57-1785				<u>7523</u>	Ju	N
	5. Generator's Name	and Mailir				Generator'	s Site Address	(if different tha	n mailing addre	ss)			
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Ш	1001 22m/ A Oskisno, CA		L 120			្វិច	kland, CA	94521-353	5 US/				
Ш	Generator's Phone:		134-20-57										
۱t	6. Transporter 1 Con	ngany Nam	ne j						U.S. EPA ID				
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۱ŀ	7. Transporter 2 Con								U.S. EPAID	Number			
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۱t	8. Designated Facilit	y Name ar	nd Site Address)					U.S. EPA ID		-		
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1	marked and la	beled/plac	OR'S CERTIFICATION: Thereby de arded, and are in all respects in prope contents of this consignment confo	per condition for transport a rm to the terms of the attac	ccording to app thed EPA Ackno	nicable inter Wiedament	mational and n of Consent.	ational govern	nentai regulation	is. Il export s	iipinon ana re		
	l certify that th	e waste m	inimization statement identified in 40	CFR 262.27(a) (if I am a la	arge quantity ge	rerator) or	(b) (if I am a şı	mall quantity ge	enerator) is true.				
١	Generator's/Offeror	's Printed/	Typed Name	_	S	ighature					Mon	•	
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Ė	16. International Sh	ipments	Import to U.S.		Export from	.u.s. —	Port of	entry/exit:					
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F	Facility's Phone:		W. (O)								Mo	nth Da	ay Year
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DESIGNATED FACILITY	19. Hazardous Wa	ste Report	Management Method Codes (i.e., co	odes for hazardous waste t			cycling system	s)	4.				
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			er or Operator: Certification of receipt	of hazardous materials co	vered by the ma	anifest exce Signature	pt as noted in	Item 188			Mo	nth, ⊿Da	y <u>Y</u> ear
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Ш	W	ASTE MANIFEST	CACGOGE/7778		4	410-057-176	:	100	541	152	9 J ,	JK
Ш	5. Ge	nerator's Name and Mailin	ng Address			Generator's Site Ad					···	
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11.				Name, Hazard Class, ID Numb		1 40.6	ontainers	T	T			
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Ш	10.	marked and labeled/placar	rded, and are in all respects in	n proper condition for transport a	according to applica	ible international an	d national governn	e by the propers nental regulation:	s. If export shi	pment and I	am the Prim	ary
Ш				conform to the terms of the attac								
		certify that the waste mini ator's/Offeror's Printed/Typ		in 40 CFR 262.27(a) (if I am a l	arge quantity gener		a small quantity ge	nerator) is true.		Mor	ith Day	Year
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	A N	enerator's Name and Mailin Applie Public School Cit 2855 Ave., Ste Urkford, CA 94505 erator's Phone:	-				1005	esta Ax	•	an mailing addre	ess)		
	6. Tra	ansporter 1 Company Nam	MI	/lG					**************************************	U.S. EPAID U.S. EPAID	9000	103	5820
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	9a. HM		on (including Prope	r Shipping Nam	e, Hazard Class, ID Num	ber,	-	10. Contai	iners Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste	e Codes
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A		FORM HAZARDOUS	Generator ID Number	2. Pag	e 1 of	3. Emerg	ency Response	Phone	4. Manifest	Tracking Nu	mber 7 F A C	· II	
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	į.	Kettleman Gilv. CA	93239										l
	Faci	ility's Phone: 209-355-97	711										
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Ш		Evporter I certify that the	contents of this consignment conform to	the terms of the attached EPA.	Acknov	viedament	of Consent.						İ
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		FORM HAZARDOUS ASTE MANIFEST	1. Generator ID Number CACGCCS17776		1 .	Emergency Respon	ise Phone	4. Manifest	Tracking Nu 541	7528	8 J.	JK
	A	enerator's Name and Mailir Spire Public School 101 32nd Ave., Ste	i	,	Ge	nerator's Site Addres	•	nan mailing addre	ss)			
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	33	3251 Old Skylins R Stilleman City, CA	oad					GATO	NGC5451 17	7		
	Facilit	ty's Phone: ^{GDS} -385-97	711									
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Form Approved. OMB No. 2050-0039

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Ш		enerator's Name and Maili โรยโกล Public Schoo				Generator's Site Addre	-	nan mailing addre	ss)		·	
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		I certify that the waste mir erator's/Offeror's Printed/Ty	nimization statement identifie pped Name	d in 40 CFR 262.27(a) (if I		rator) or (b) (it i am a s nature	mali quantity ge	enerator) is true.		s Montl	h Day	Year
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	20. D	Designated Facility Owner of	or Operator: Certification of re	eceipt of hazardous materi	als covered by the manif	est except as noted in l	tem 18a					
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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, package marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary									jed, ry									
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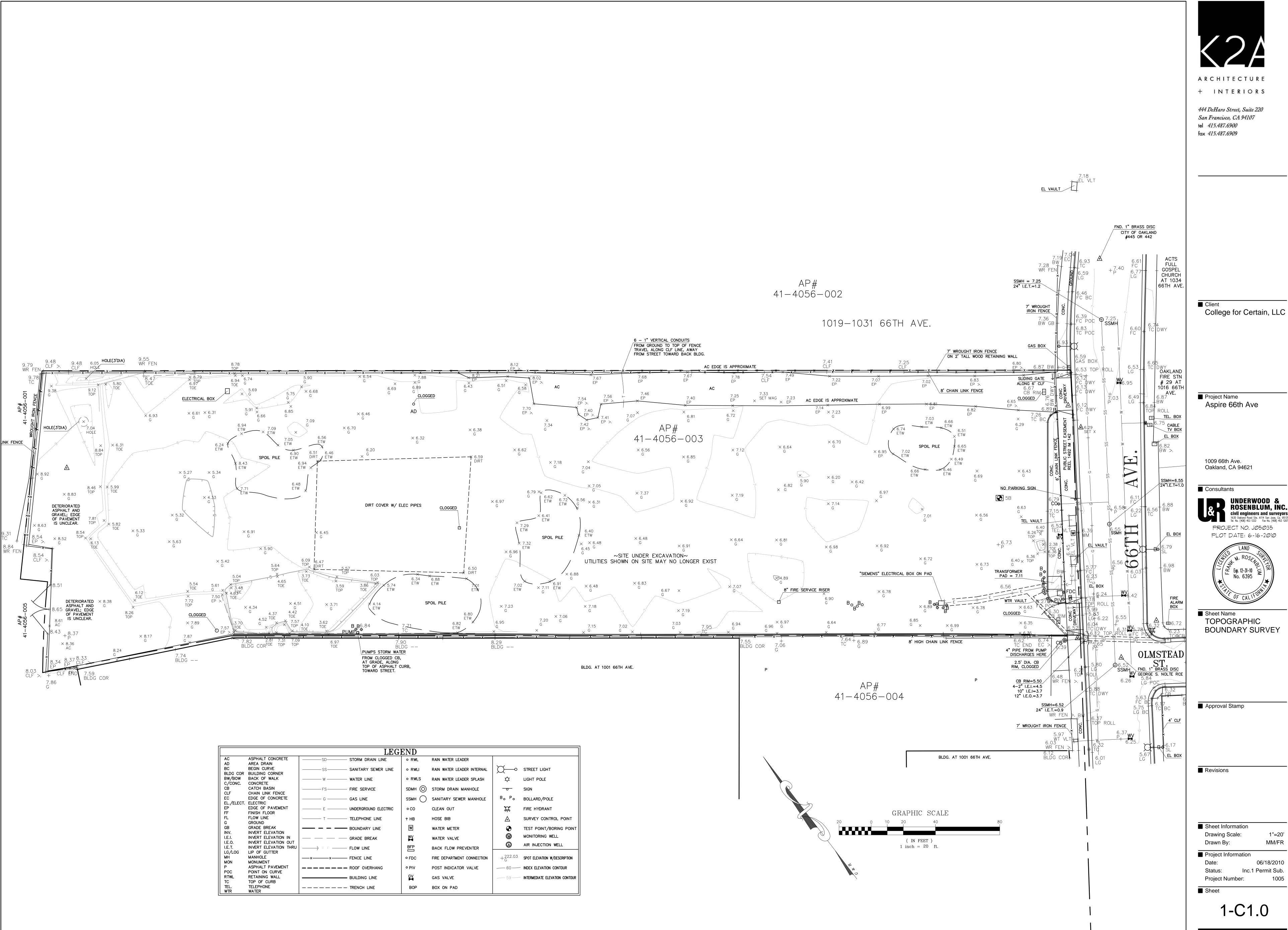
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Arr.Date Manifest	Profile	RCV Gross Weight	RCV Tare Weight	RCV Net Weight	Net Tons	Gen. Name
11/19/2009 006299826JJK	CA578935	75280	31960	43320	21 66	ASPIRE PUBLIC SCHOOLS
006299827JJK		77360	32040	45320		ASPIRE PUBLIC SCHOOLS
006299829JJK		80360	30600	49760		ASPIRE PUBLIC SCHOOLS
006299830JJK		91200	32020	59180		ASPIRE PUBLIC SCHOOLS
006299831JJK		76560	29540	47020		ASPIRE PUBLIC SCHOOLS
006299832JJK	CA578935	80580	32600	47980	23.99	ASPIRE PUBLIC SCHOOLS
TOTAL				292580	146.29	
COUNT 6						
11/20/2009 006299828JJK	CA578935	81700	30160	51540	25.77	ASPIRE PUBLIC SCHOOLS
006299833JJK	CA578935	64220	34060	30160	15.08	ASPIRE PUBLIC SCHOOLS
006299834JJK	CA578935	71340	33660	37680	18.84	ASPIRE PUBLIC SCHOOLS
TOTAL				119380	59.69	
COUNT 3						
12/10/2009 006299813JJK		80200	34840	45360		ASPIRE PUBLIC SCHOOLS
006299814JJK		79820	32540	47280		ASPIRE PUBLIC SCHOOLS
006299815JJK		78960	30560	48400		ASPIRE PUBLIC SCHOOLS
006299816JJK		91000	32380	58620		ASPIRE PUBLIC SCHOOLS
006299817JJK	CA578935	77000	32620	44380		ASPIRE PUBLIC SCHOOLS
TOTAL				244040	122.02	
COUNT 5						
12/11/2009 006299812JJK	CA578935	84060	30800	53260		ASPIRE PUBLIC SCHOOLS
TOTAL				53260	26.63	
COUNT 1						
Total Documents:				700000	05/00	
TOTAL				709260	354.63	
COUNT 15						
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Appendix C

Grading Plan



1"=20' MM/FR

06/18/2010 Inc.1 Permit Sub. SOIL MANAGEMENT PLAN FORMER PACIFIC ELECTRIC MOTORS SITE, 1009 66TH AVENUE, OAKLAND, CALIFORNIA

1. SOIL REMEDIATION

TPH, PCBS, AND METALS WERE DETECTED IN SOIL AT SEVERAL LOCATIONS AT THE SITE ABOVE THE CLEANUP GOALS. SOIL EXCAVATION AND OFF-SITE DISPOSAL HAS TAKEN PLACE AT SEVERAL AREAS ACROSS THE SITE (FIGURE 2). AS A RESULT OF THIS WORK, IT IS UNLIKELY THAT AFFECTED SOIL WILL BE ENCOUNTERED DURING SITE REDEVELOPMENT ACTIVITIES.

THE MOST LIKELY LOCATION FOR AFFECTED SOIL TO BE ENCOUNTERED DURING REDEVELOPMENT ACTIVITIES IS ALONG THE PROPERTY BOUNDARY AT THE NORTHWESTERN PORTION OF EXCAVATION PCB3 AND THE PROPERTY BOUNDARY AT THE NORTHEASTERN PORTION OF EXCAVATION EXC4 (SEE FIGURE 2).

2.SOIL MANAGEMENT PROTOCOLS

THE FOLLOWING SECTIONS PRESENT THE MANAGEMENT PROTOCOLS FOR HANDLING, MOVING, STOCKPILING, AND REUSING NATIVE SOIL DURING AND FOLLOWING THE DEVELOPMENT AT THE SITE. CONTINGENCY PROTOCOLS TO BE FOLLOWED WHEN UNKNOWN CONTAMINATION OR UNDERGROUND STRUCTURES ARE IDENTIFIED ARE ALSO PRESENTED.

2.1 OVERVIEW OF SOIL DISTURBANCE ACTIVITIES

ACTIVITIES CAUSING SOIL DISTURBANCE ANTICIPATED AT THE SITE INCLUDE: SITE GRADING; GRUBBING; REMOVING/INSTALLING UNDERGROUND UTILITIES AND UTILITY PIPELINE REPAIR ACTIVITIES: PLANTING TREES: INSTALLING FOUNDATIONS. UNDERGROUND SHELTERS, GARAGES, OR BASEMENTS; AND PERFORMING OTHER CONSTRUCTION ACTIVITIES. THE ELEVATION OF THE SITE RANGES FROM APPROXIMATELY 12 TO 14 FEET ABOVE MEAN SEA LEVEL (MSL). CFC PROPOSES TO IMPORT CLEAN, ENGINEERED FILL TO "BALANCE" THE SITE. A GRADING PLAN WAS NOT AVAILABLE AT THE TIME OF THE PREPARATION OF THIS SMP. A GRADING PLAN WILL BE PREPARED BY OTHERS (UNDER THE DIRECTION OF CFC) AND SUBMITTED UNDER SEPARATE COVER. REQUIREMENTS FOR IMPORTED FILL MATERIALS ARE DISCUSSED IN MORE DETAIL IN SECTION 5.4.

GROUNDWATER WAS PREVIOUSLY ENCOUNTERED BETWEEN APPROXIMATE DEPTHS OF 3 TO 15 FEET BELOW GROUND SURFACE (BGS; LFR 2009A). THE PROJECT OWNER WILL NOT USE GROUNDWATER DURING CONSTRUCTION. ANY GROUNDWATER ENCOUNTERED WILL BE SAMPLED PRIOR TO OFF-SITE DISPOSAL, IF NECESSARY, AND HANDLED IN ACCORDANCE WITH THE PROTOCOLS PRESENTED IN THE SWPPP (PRESENTED UNDER SEPARATE COVER).

2.2 NOTIFICATIONS

THE PERSONS INDICATED IN THE TABLE BELOW MUST BE NOTIFIED WITHIN 48 HOURS IF SUBSURFACE DISTURBANCE IS ANTICIPATED OR IF UNEXPECTED AFFECTED SOIL IS ENCOUNTERED. ADDITIONALLY, IF SOIL IS TO BE TRANSPORTED FROM THE SITE TO AN APPROPRIATE LANDFILL, THE FOLLOWING CONTACTS MUST BE NOTIFIED.

TABLE 1: EMERGENCY CONTACTS

CONTACTTELEPHONEOWNER - CFC CONTACT: CHARLES ROBITAILLE, PROJECT MANAGER

925.698.1118

ALAMEDA COUNTY ENVIRONMENTAL HEALTH CONTACT: PARESH KHATRI510.777.2478ENVIRONMENTAL CONSULTANT — ARCADIS CONTACT: RON GOLOUBOW510.652.4500 OFFICE 510.501.1789 CELLSITE CONSTRUCTION MANAGER

CONTACT: *** TO BE DESIGNATED BEFORE WORK BEGINS***** TO BE DESIGNATED BEFORE WORK BEGINS***IF AN EMERGENCY SITUATION REQUIRING MEDICAL ATTENTION, CONTAINMENT ASSISTANCE, OR OTHER EMERGENCY ASSISTANCE ARISES, WORKERS SHOULD CALL 911 AND FOLLOW EMERGENCY PROCEDURES PROVIDED IN THE CONTRACTOR'S HEALTH AND SAFETY PLAN (HSP).

2.3 SOIL MANAGEMENT STRATEGY

SOIL WILL BE REUSED AT THE SITE TO THE EXTENT POSSIBLE. SUSPECTED AFFECTED SOIL (E.G., SOIL EXHIBITING DISCOLORATION, OILY LIQUIDS, POWDERS, OR OTHER SUBSTANCES, ODORS, OR DETECTIONS ON FIELD EQUIPMENT) WILL BE STOCKPILED AND TESTED. THIS SOIL WILL ONLY BE REUSED IF IT MEETS THE REMEDIAL GOALS DISCUSSED IN SECTION 3.0.

THROUGHOUT THE GRADING ACTIVITIES THAT WILL BE CONDUCTED DURING THE REDEVELOPMENT OF THE SITE, NATIVE SOIL AND EXISTING FILL MATERIAL WILL BE HANDLED AND MOVED FROM ONE PORTION OF THE SITE TO ANOTHER. THE NET BALANCE OF SOIL FROM CUT AND FILL GRADING WILL PROBABLY NOT REQUIRE REMOVAL OF SOIL FROM THE SITE.

2.4 REQUIREMENTS FOR IMPORTED FILL

SOIL THAT IS IMPORTED TO THE SITE FOR USE AS FILL MUST BE SAMPLED PRIOR TO BEING BROUGHT ON SITE. A FOUR—POINT COMPOSITE SAMPLE SHOULD BE COLLECTED FOR EVERY 500 CUBIC YARDS OF FILL MATERIAL IMPORTED TO THE SITE AND SUBMITTED FOR THE FOLLOWING ANALYSES:

- VOLATILE ORGANIC COMPOUNDS (VOCS) BY EPA METHOD 8260B
- METALS BY EPA METHOD 6010B
- SEMIVOLATILE ORGANIC COMPOUNDS (SVOCS) BY EPA METHOD 8270
- PCBS BY EPA METHOD 8082
- ORGANOCHLORINE PESTICIDES BY EPA METHOD 8081
- TPH BY EPA METHOD 8015M

THE ANALYTICAL RESULTS FOR EACH OF THE CONSTITUENTS SHOULD BE LESS THAN THE FINAL ENVIRONMENTAL SCREENING LEVELS (ESLS) FOR SHALLOW SOIL (LESS THAN 1 METER BGS) FOR COMMERCIAL AND INDUSTRIAL PROPERTIES WHERE THE GROUNDWATER IS NOT A POTENTIAL SOURCE OF DRINKING WATER (TABLE B-2, RWQCB 2008), WITH THE EXCEPTION OF ARSENIC. ARSENIC CONCENTRATIONS SHOULD BE LESS THAT THE SITE—SPECIFIC BACKGROUND CONCENTRATION OF 7 MG/KG (SEE DISCUSSION PRESENTED IN APPENDIX B OF THE CAP).

2.5 DETECTION OF UNANTICIPATED AFFECTED SOIL

THIS SECTION DESCRIBES THE PROTOCOLS TO BE FOLLOWED IN THE EVENT THAT UNKNOWN AREAS OF AFFECTED SOIL AND/OR UNDERGROUND STRUCTURES ARE IDENTIFIED DURING SITE DEVELOPMENT. THESE PROTOCOLS WILL BE FOLLOWED BY ALL INVOLVED PARTIES, INCLUDING CFC AND OTHER ENTITIES, SUCH AS A CONTRACTOR OR QUALIFIED CONSULTANT, DESIGNATED OR CERTIFIED BY CFC.

UNKNOWN CONDITIONS (E.G., SUSPECTED AFFECTED SOIL) THAT MAY TRIGGER CONTINGENCY MONITORING PROCEDURES DURING SITE DEVELOPMENT INCLUDE, BUT ARE NOT LIMITED TO, THOSE LISTED BELOW. DISCOVERY OF ANY OF THESE CONDITIONS COULD REQUIRE EITHER ALTERNATIVE OR ADDITIONAL MEASURES TO PROTECT HUMAN HEALTH AND THE ENVIRONMENT:

- OILY, SHINY, OR SATURATED SOIL OR FREE PRODUCT
- SOIL WITH A STRONG CHEMICAL ODOR
- DISCOVERY OF OBJECTS OF ENVIRONMENTAL CONCERN SUCH AS UNDERGROUND STORAGE TANKS (USTS) AND ASSOCIATED PIPING OR BURIED DRUMS
- · DISCOVERY OF DEBRIS (E.G., BURIED REFUSE, ASBESTOS—CONTAINING PIPES, AND TRANSITE PIPES)
- DISCOVERY OF HAZARDOUS STORAGE AREAS
- DISCOVERY OF CRACKED OR REPAIRED CONCRETE IN AREAS WHERE HAZARDOUS MATERIALS WERE USED OR STORED · OTHER CONDITIONS THAT VARY MATERIALLY FROM THOSE DOCUMENTED DURING PREVIOUS INVESTIGATIONS
- IF SUSPECTED AFFECTED SOIL IS DETECTED DURING SUBSURFACE DISTURBANCE WORK, THE FOLLOWING PROCEDURES SHALL BE FOLLOWED:
- ALL FIELD ACTIVITIES THAT MAY POTENTIALLY DISTURB THE SUSPECTED
- AFFECTED SOIL MUST BE IMMEDIATELY STOPPED AND THE SITE VACATED. IF AN EMERGENCY SITUATION ARISES SUCH THAT EMERGENCY SERVICES ARE NEEDED, CALL 911 AND FOLLOW THE EMERGENCY PROCEDURES GIVEN IN THE
- NOTIFY THE EMERGENCY CONTACTS LISTED IN SECTION 5.2.
- ANY EQUIPMENT AND CLOTHING THAT COMES IN CONTACT WITH THE SUSPECTED OR KNOWN AFFECTED SOIL MUST BE DECONTAMINATED AS SPECIFIED IN THE CONTRACTOR'S HSP.
- · IF STOCKPILING IS NECESSARY, STOCKPILES WILL BE PLACED ON PLASTIC SHEETING AND COVERED AT THE END OF EACH WORK DAY.

DURING THE EXCAVATION AND CONSTRUCTION ACTIVITIES CONDUCTED AT THE SITE, IT IS POSSIBLE THAT USTS, SUMPS, OR OTHER UNDERGROUND STRUCTURES THAT WERE NOT IDENTIFIED DURING PREVIOUS SITE INVESTIGATIONS WILL BE DISCOVERED. FOR EXAMPLE, A UST MAY BE IDENTIFIED DURING GRADING AND SITE EXCAVATION ACTIVITIES BY BEING UNEARTHED. OTHER SUBSURFACE STRUCTURES MIGHT NOT HAVE FEATURES THAT EXTEND ABOVE THE EXCAVATED SURFACE AND COULD BE UNEARTHED WHEN CONSTRUCTION EQUIPMENT COMES INTO CONTACT WITH THEM. THE REMAINDER OF THIS SECTION OUTLINES THE MEASURES THAT GOVERN IDENTIFICATION AND REMOVAL OF USTS, AND APPROPRIATE MEASURES FOR ADDRESSING OTHER UNDERGROUND STRUCTURES ENCOUNTERED DURING DEVELOPMENT.

CHAPTER 6.7 OF THE CALIFORNIA HEALTH AND SAFETY CODE CONTAINS THE SPECIFIC REQUIREMENTS FOR REMOVING AND REMEDIATING AFFECTED SOIL ASSOCIATED WITH A LEAKING UST (LUST). THE COUNTY WITHIN WHICH THE UST IS ENCOUNTERED IS RESPONSIBLE FOR LOCAL OVERSIGHT AND OVERSEES THE REMOVAL OF USTS. ENVIRONMENTAL INVESTIGATIONS AND RESPONSES REQUIRED FOLLOWING REMOVAL OF THE UST WILL BE CONDUCTED UNDER THE DIRECTION OF THE ACEH AND IN ACCORDANCE WITH THE SPECIFIC PROVISIONS DELINEATED IN CHAPTER 6.7 OF THE CALIFORNIA HEALTH AND SAFETY CODE. ACCORDINGLY, THE OAKLAND FIRE DEPARTMENT WILL BE NOTIFIED IN THE EVENT THAT A LUST OR APPURTENANT PIPING IS DISCOVERED DURING CONSTRUCTION AND DEVELOPMENT OF THE SITE.

FOR OTHER SUBSURFACE STRUCTURES THAT MAY HAVE BEEN RELATED TO FORMER USE AND STORAGE OF CHEMICALS, SUCH AS UNDERGROUND VAULTS AND SUMPS, THE FOLLOWING PROCEDURES WILL BE IMPLEMENTED TO DETERMINE THE PROPER DISPOSITION OF THE ENCOUNTERED STRUCTURE.

THE STRUCTURE WILL BE INSPECTED TO ASSESS WHETHER IT CONTAINS ANY INDICATION OF CHEMICAL RESIDUALS OR FREE LIQUIDS OTHER THAN WATER. THE ENVIRONMENTAL ENGINEER WILL MAKE THIS ASSESSMENT IN THE FIELD USING VISUAL OR OLFACTORY EVIDENCE, OR FIELD MONITORING EQUIPMENT. IF THERE IS NO INDICATION, BASED ON VISUAL OBSERVATION, ODOR, OR FIELD AIR MONITORING EQUIPMENT, OF CHEMICAL IMPACT WITHIN THE VAULT OR SUMP, THEN REMOVAL OF THE STRUCTURE IS NOT NECESSARY FOR ENVIRONMENTAL REASONS, BUT MAY BE PRUDENT FOR STRUCTURAL REASONS FOR PROPOSED NEW SCHOOL CONSTRUCTION.

IF A SUMP OR VAULT CONTAINS LIQUIDS THAT APPEAR TO CONTAIN CHEMICALS, BASED ON VISUAL OBSERVATIONS, ODOR, OR FIELD AIR MONITORING EQUIPMENT, THEN THE FOLLOWING STEPS SHALL BE TAKEN:

- THE CHEMICAL WILL BE CHARACTERIZED AND THE APPROPRIATE RESPONSE ACTION WILL BE DETERMINED.
- THE POTENTIALLY CHEMICAL—CONTAINING LIQUIDS WILL BE SAMPLED AND ANALYZED FOR PROFILING PURPOSES.
- THE LIQUIDS WILL BE PROPERLY REMOVED AND DISPOSED OF UNDER THE DIRECTION OF CFC OR THE DESIGNATED ENVIRONMENTAL ENGINEER.
- A REPORT WILL BE PREPARED DOCUMENTING RESPONSE ACTIVITIES FOR SUBMITTAL TO THE OAKLAND FIRE DEPARTMENT, ACEH, AND THE RWQCB. IF FREE PRODUCT IS ENCOUNTERED, THE AREAL EXTENT AND THICKNESS WILL BE ASSESSED, THE CHEMICAL CHARACTERIZED, AND THE SOIL EXCAVATED. THE EXCAVATED SOIL WILL BE STOCKPILED AND DISPOSED OF OFF SITE IF NECESSARY.

IF UNANTICIPATED AFFECTED SOIL IS ENCOUNTERED, IT MUST BE DOCUMENTED IN A REPORT THAT IS SUBMITTED TO THE ACEH WITHIN 30 DAYS AFTER THE DISCOVERY OF THE UNANTICIPATED AFFECTED SOIL. THIS REPORT WILL INCLUDE THE FOLLOWING:

- · A BRIEF DESCRIPTION OF THE NATURE OF SUSPECTED AFFECTED SOIL AND HOW IT WAS DISCOVERED
- VERIFICATION OF NOTIFICATION OF THE EMERGENCY CONTACTS LISTED IN SECTION 5.2
- · VERIFICATION THAT THE PROCEDURES OUTLINED IN THIS SMP WERE FOLLOWED ANALYTICAL RESULTS FOR ALL SITE CHARACTERIZATION DATA (INCLUDING STOCKPILE AND CONFIRMATION SAMPLING) COLLECTED 2.6 STOCKPILE MANAGEMENT

SOIL GENERATED FROM CONSTRUCTION ACTIVITIES MAY BE STOCKPILED ON SITE. THE STOCKPILES WILL BE PLACED ON POLYETHYLENE SHEETING AND COVERED UNLESS IN USE TO PREVENT OFF—SITE SOIL MIGRATION DUE TO WIND AND RAIN EROSION. THE COVERS WILL CONSIST OF PLASTIC SHEETING AND/OR NON-TOXIC SOIL BINDERS. THE CONSTRUCTION MANAGER WILL HAVE THE FOLLOWING RESPONSIBILITIES CONCERNING THE ON—SITE STOCKPILES:

- MONITORING THE STOCKPILE COVERS ON A DAILY BASIS
- ENSURING THAT ACCUMULATION RECORDS ARE MAINTAINED AND KEPT IN A FIELD BOOK ON SITE DESCRIBING WHERE SOIL WAS EXCAVATED AND THE APPROXIMATE AMOUNT OF SOIL IN EACH STOCKPILE
- GATES OR HOLES TO PREVENT UNAUTHORIZED ACCESS BY THE PUBLIC MITIGATION PROCEDURES TO PREVENT WIND EROSION FROM THE STOCKPILES INCLUDE SPRAYING THEM WITH ENOUGH WATER OR ANOTHER ACCEPTED MATERIAL TO KEEP THE SOIL SLIGHTLY DAMP, BUT NOT ENOUGH TO CREATE RUN-OFF FROM OVERSATURATION. STOCKPILES WILL NOT BE PILED EXCESSIVELY HIGH TO FURTHER PREVENT AIRBORNE TRANSPORT OF STOCKPILE MATERIAL.

MONITORING THE FENCES SURROUNDING THE CONSTRUCTION SITE FOR OPEN

INACTIVE STOCKPILES WILL ALSO BE PROTECTED FROM POTENTIAL RUN-OFF DUE TO RAIN USING PLASTIC SHEETING. IN ADDITION, A BERM MADE OF HAY BALES OR ANOTHER ACCEPTED MATERIAL WILL BE PLACED AROUND EACH STOCKPILE TO CAPTURE ANY POTENTIAL RUN-OFF FROM THE STOCKPILE. THE STOCKPILES WILL BE PLACED ON POLYETHYLENE SHEETING, AWAY FROM STORM DRAINS AND SURFACE-WATER DRAINAGE COURSES. CONSTRUCTION ACTIVITIES WILL BE CONDUCTED IN ACCORDANCE WITH A SWPPP THAT WILL BE PREPARED AND SUBMITTED TO THE RWQCB UNDER SEPARATE COVER BY THE CONTRACTOR WHO WILL PERFORM THE WORK. AS OUTLINED IN THE SWPPP, BEST MANAGEMENT PRACTICES (INCLUDING STRUCTURAL CONTROLS) WILL BE INSTALLED TO PREVENT ANY MIGRATION OF SEDIMENTS TO STORM DRAINS.

GROUNDWATER MAY BE ENCOUNTERED DURING SOIL DISTURBANCES, SINCE GROUNDWATER HAS BEEN ENCOUNTERED IN THE UPPER 5 FEET OF SOIL AT SOME PORTIONS OF THE SITE. HOWEVER, IN THE UNLIKELY EVENT OF EXCAVATION OF SATURATED SOILS, THE SOIL WILL BE STOCKPILED AND THE WATER WILL BE ALLOWED TO DRAIN ONTO THE GROUND SURFACE. THE SEDIMENTS WILL BE DRIED BY MECHANICAL MEANS AND THE RELATED DRAINAGE WILL NOT BE ALLOWED TO DRAIN TO ANY WATER COURSE.

2.7 WASTE CHARACTERIZATION AND HANDLING PROCEDURES

WHENEVER POSSIBLE, THE SOIL EXCAVATED AND STOCKPILED DURING SITE ACTIVITIES WILL BE REUSED. THE SOIL WILL ONLY BE REUSED IF IT MEETS ALL REMEDIAL GOALS DISCUSSED IN SECTION 3.0. AS DISCUSSED IN SECTION 3.0, SUSPECTED AFFECTED SOIL (E.G., SOIL EXHIBITING DISCOLORATION, FOREIGN LIQUIDS, POWDERS OR OTHER SUBSTANCES, ODORS, OR DETECTIONS ON FIELD EQUIPMENT) WILL BE TESTED. IF THE SOIL IS DETERMINED TO BE UNSUITABLE FOR REUSE, IT WILL BE SENT TO A PROPER DISPOSAL FACILITY FOLLOWING APPLICABLE REGULATIONS.

THE STATE OF CALIFORNIA'S HAZARDOUS WASTE REGULATIONS, THE RESOURCE CONSERVATION AND RECOVERY ACT, AND OTHER APPLICABLE WASTE MANAGEMENT REGULATIONS HAVE REQUIREMENTS AND PROCEDURES FOR THE HANDLING OF WASTE. THE REGULATIONS REGARDING LAND DISPOSAL OF WASTE ARE OVERSEEN IN CALIFORNIA BY THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC) AND THE RWQCB.

GENERATORS OF WASTE RESULTING FROM SITE ACTIVITIES WILL BE RESPONSIBLE FOR CHARACTERIZING THE WASTE TO DETERMINE IF THE MATERIAL SHOULD BE CLASSIFIED AS HAZARDOUS OR NON-HAZARDOUS ACCORDING TO CALIFORNIA REGULATIONS (TITLE 22, CALIFORNIA CODE OF REGULATIONS). GENERATORS ARE DEFINED AS THE PERSON(S) OR ORGANIZATION(S) INVOLVED THAT PRODUCE THE WASTE, OR WHOSE ACTIONS CAUSE THE WASTE TO BE SUBJECT TO REGULATION 40, CODE OF FEDERAL REGULATIONS 260.10. ALL GENERATED WASTES MUST BE ADEQUATELY CHARACTERIZED TO ENSURE PROPER WASTE MANAGEMENT AND DISPOSAL TO THE PROPER FACILITY. THE WASTE WILL BE CHARACTERIZED BY EITHER USING THE STANDARD EPA TESTING METHODS OR BY APPLYING KNOWLEDGE TO THE PROCESS IN WHICH THE WASTE WAS GENERATED (E.G., SITE HISTORY INFORMATION AND ANALYTICAL DATA COLLECTED FROM THE WASTE STREAMS).

STOCKPILE SAMPLING WILL CONSIST OF A FOUR-POINT COMPOSITE SAMPLE FOR APPROXIMATELY EVERY 500 CUBIC YARDS. ANALYTES ARE TO BE SELECTED BASED ON THE CHEMICALS OF CONCERN (COCS) LISTED IN SECTION 3.0. IN SOME CASES, OFF-SITE DISPOSAL FACILITIES MAY REQUIRE ADDITIONAL SAMPLES OR ANALYSES OF THE WASTE STREAM BEFORE ACCEPTING THE WASTE. THE PROFILING OF THE WASTE FOR THE OFF-SITE DISPOSAL FACILITY MAY BE NECESSARY TO DETERMINE PROPER DISPOSAL METHODS, VERIFY THAT THE WASTE MEETS ALL ACCEPTANCE CRITERIA OF THE DISPOSAL FACILITY, AND ENSURE COMPLIANCE WITH ALL FEDERAL, STATE, AND LOCAL REGULATIONS. CHARACTERIZATION INFORMATION WILL

BE DOCUMENTED ON A WASTE PROFILE FORM PROVIDED BY THE OFF-SITE FACILITY. WASTE CHARACTERIZATION SAMPLES WILL BE COLLECTED WITHIN 30-DAYS OF THE WASTE ACCUMULATION START DATE.

WASTE GENERATED FROM SITE CONSTRUCTION ACTIVITIES WILL BE SEPARATED INTO HAZARDOUS AND NON-HAZARDOUS WASTES. CALIFORNIA REGULATIONS STATE THAT HAZARDOUS WASTE MUST BE REMOVED FROM THE SITE WITHIN 90 DAYS FROM THE FIRST DATE ON WHICH ANY AMOUNT OF HAZARDOUS WASTE STARTS TO ACCUMULATE. OTHER WASTE (NON-HAZARDOUS) ACCUMULATED ON SITE WILL BE REMOVED FROM THE SITE AS SOON AS POSSIBLE UNLESS REUSED.

- IF THE SOIL IS CLASSIFIED AS NOT SUITABLE FOR REUSE, THE FOLLOWING ACTIONS WILL OCCUR:
- · THE WASTE SOIL WILL BE STOCKPILED NEAR THE AREA OF CONCERN IN THE
- SUBSURFACE DISTURBANCE AREA. THE HAZARDOUS WASTE AREAS WILL CONTAIN EMERGENCY EQUIPMENT
- SUFFICIENT TO RESPOND TO THE HAZARDS CREATED BY THE WASTE. ALL STOCKPILES WILL BE PLACED ON PLASTIC SHEETING, WITH COVERS AND PERIMETER BERMS TO PREVENT OFF-SITE MIGRATION OF SOIL AND RUN-OFF DUE TO RAIN EROSION.
- STOCKPILE COVERS WILL BE SECURED IN PLACE WHEN STOCKPILES ARE NOT IN
- A DAILY INSPECTION OF THE STOCKPILES WILL BE CONDUCTED TO ENSURE THE INTEGRITY OF PROTECTION USED ON THE STOCKPILES.
- ALL INSPECTIONS ALONG WITH RECORDS OF ACCUMULATION DATES OF THE STOCKPILES WILL BE RECORDED AND MAINTAINED ON SITE. ANY ACCUMULATED FREE LIQUIDS WILL BE REMOVED AND PLACED IN A
- THE HAZARDOUS WASTE WILL NOT BE DILUTED UNLESS ALLOWED BY STATE AND FEDERAL REGULATIONS.
- ALL TRANSPORTATION OF HAZARDOUS WASTE WILL BE CONDUCTED IN ACCORDANCE WITH REGULATORY REQUIREMENTS.

2.8 CONSTRUCTION WORKER MANAGEMENT MEASURES

DURING CONSTRUCTION ACTIVITIES, WORKERS WHO MAY DIRECTLY CONTACT THE NATIVE SOIL WILL CONDUCT THE WORK IN ACCORDANCE WITH CAL-OSHA TRAINING AND WORKER PROTECTION RULES AND REGULATIONS. THE TYPES OF HAZARDS THAT CONSTRUCTION WORKERS OR OTHER WORKERS INVOLVED IN ACTIVITIES THAT DISRUPT SOIL ARE MOST LIKELY TO ENCOUNTER INCLUDE THE FOLLOWING:

- IDENTIFYING PREVIOUSLY UNKNOWN STRUCTURES OR AREAS OF AFFECTED SOIL HAVING DIRECT CONTACT WITH FILL MATERIALS THAT CONTAIN INORGANIC
- CONSTITUENTS, LEAD, OR PETROLEUM COMPOUNDS CAL-OSHA IS THE STATE AGENCY RESPONSIBLE FOR MONITORING COMPLIANCE WITH WORKER HEALTH AND SAFETY LAWS AND REQUIREMENTS. COMPLIANCE WITH STANDARD CAL-OSHA REGULATIONS, PARTICULARLY TITLE 8, CHAPTER 4, "DIVISION OF INDUSTRIAL SAFETY," WILL MINIMIZE THE POTENTIAL EFFECTS ASSOCIATED WITH EXCAVATION ACTIVITIES, SINCE THE INTENT OF THESE STANDARDS IS TO PREPARE WORKERS FOR THE TYPES OF HAZARDS THAT ARE LIKELY TO BE ENCOUNTERED DURING SUCH ACTIVITIES.

ALL ACTIVITIES CONDUCTED WITHIN THE SITE MUST BE IN COMPLIANCE WITH CURRENT CAL-OSHA RULES AND REGULATIONS, EVEN IF NOT EXPRESSLY NOTED IN THIS SMP. FURTHER, ALL WORKERS INVOLVED IN SUBSURFACE ACTIVITIES MUST CONDUCT THE WORK IN COMPLIANCE WITH AN ENVIRONMENTAL HSP. THE HSP IS AN ADDITIONAL MECHANISM THAT WILL PROTECT WORKERS ENGAGING IN INTRUSIVE WORK. TO ACHIEVE THAT GOAL, THE HSP WILL DELINEATE THE SPECIFIC POTENTIAL HAZARDS ASSOCIATED WITH CONTACT WITH NATIVE SOILS AT THE SITE AND WILL INFORM WORKERS THAT THE SUBSURFACE MATERIAL MAY CONTAIN LEAD OR PETROLEUM COMPOUNDS. THE HSP WILL ALSO DEFINE THE METHODS TO BE EMPLOYED TO MINIMIZE THE HAZARDS ASSOCIATED WITH SUCH ACTIVITIES.

PREPARATION OF AND COMPLIANCE WITH ALL ASPECTS OF THE HSP IS THE RESPONSIBILITY OF THE INDIVIDUALS ENGAGED IN THE INTRUSIVE ACTIVITIES. HSPS PREPARED FOR ANY CONSTRUCTION PROJECT WILL BE KEPT ON SITE DURING THE PROJECT. THIS SMP DOES NOT REQUIRE THAT CONSTRUCTION WORKERS WORKING AT THE SITE COMPLY WITH CAL-OSHA STANDARDS FOR HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE, UNLESS THE COMPANIES CONDUCTING THE INTRUSIVE WORK AT THE SITE CONCLUDE THAT IT IS REQUIRED AFTER THOROUGHLY EVALUATING THE RESIDUAL SOIL ANALYTICAL DATA RELATIVE TO THE POTENTIAL EXPOSURE TO THOSE CHEMICALS NECESSITATED BY THE TYPE OF WORK BEING CONDUCTED.

3. REFERENCES

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LFR. 2009B. TOXIC SUBSTANCE CONTROL ACT SELF—IMPLEMENTING CLEANUP NOTIFICATION AND CERTIFICATION FORMER PACIFIC ELECTRIC MOTORS FACILITY 1009 66TH AVENUE IN OAKLAND, CALIFORNIA. OCTOBER 23.

LFR. 2009C. CONDITIONAL APPROVAL OF THE TOXIC SUBSTANCE CONTROL ACT SELF—IMPLEMENTING CLEANUP NOTIFICATION AND CERTIFICATION FORMER PACIFIC ELECTRIC MOTORS FACILITY 1009 66TH AVENUE IN OAKLAND, CALIFORNIA. NOVEMBER 18.

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(RWQCB). 2008. SCREENING FOR ENVIRONMENTAL CONCERNS AT SITES WITH

REGIONAL WATER QUALITY CONTROL BOARD, SAN FRANCISCO BAY REGION

CONTAMINATED SOIL AND GROUNDWATER. REVISED: MAY.

ARCHITECTURE + INTERIORS

444 DeHaro Street, Suite 220 San Francisco, CA 9410' tel 415.487.6900

fax 415.487.6909

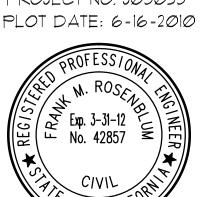
College for Certain, LLC

Project Name Aspire 66th Ave

1009 66th Ave. Oakland, CA 94621

Consultants

ROSENBLUM. INC. civil engineers and surveyors 1630 Oakland Road Ste. A114 San Jose, Ca. 95131 Tel. No. (408) 453 1222 Fax No. (408) 453 1207 PROJECT NO. JØ5Ø35



Sheet Name SOIL MANAGEMENT

PLAN

Approval Stamp

Revisions

Sheet Information Drawing Scale: Drawn By:

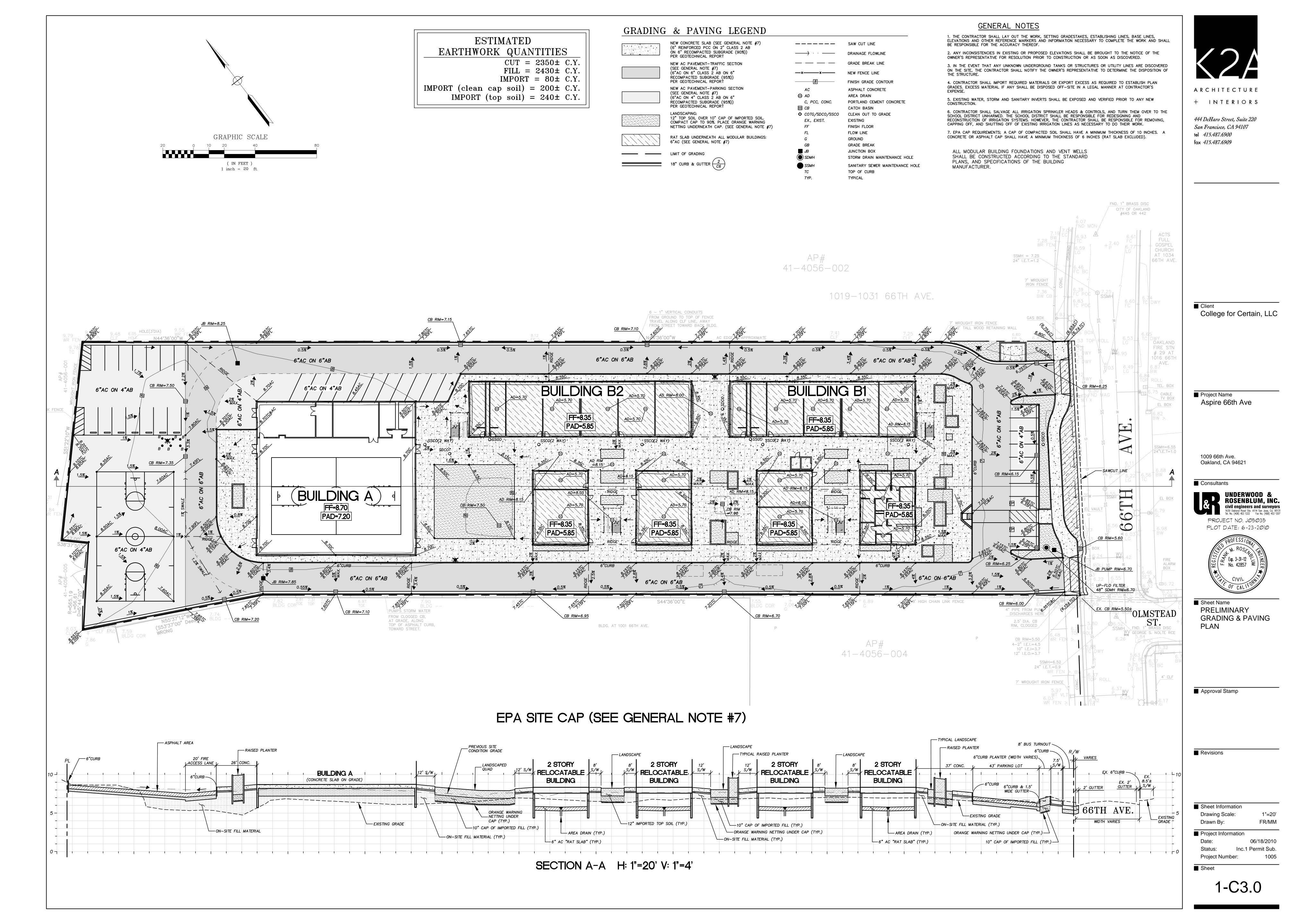
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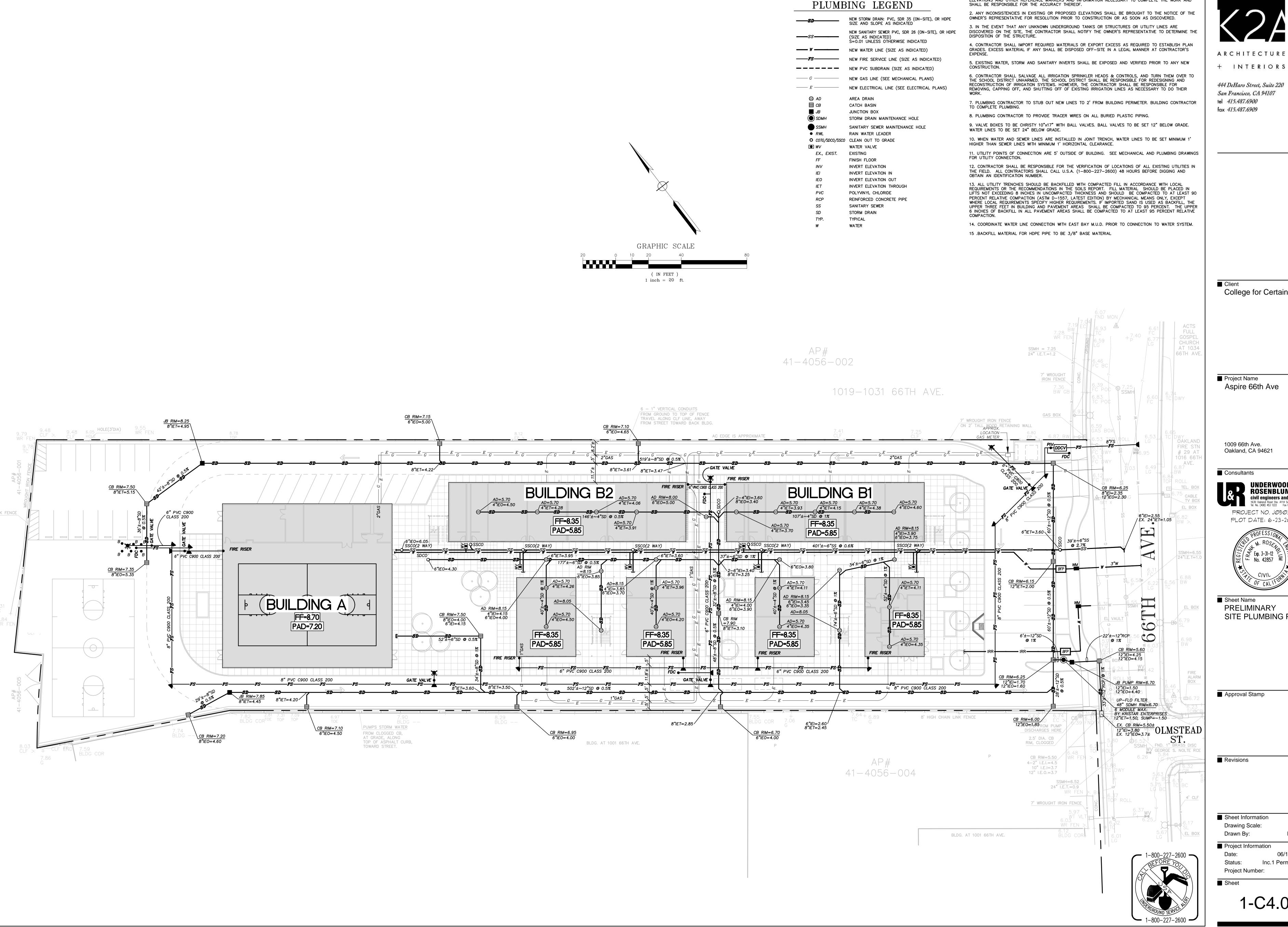
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Project Number:

1"=20'

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GENERAL NOTES

1. THE CONTRACTOR SHALL LAY OUT THE WORK, SETTING GRADE STAKES, ESTABLISHING LINES, BASE LINES, ELEVATIONS AND OTHER REFERENCE MARKERS AND INFORMATION NECESSARY TO COMPLETE THE WORK AND SHALL BE RESPONSIBLE FOR THE ACCURACY THEREOF.

College for Certain, LLC

Project Name

1009 66th Ave. Oakland, CA 94621

Consultants





Sheet Name PRELIMINARY SITE PLUMBING PLAN

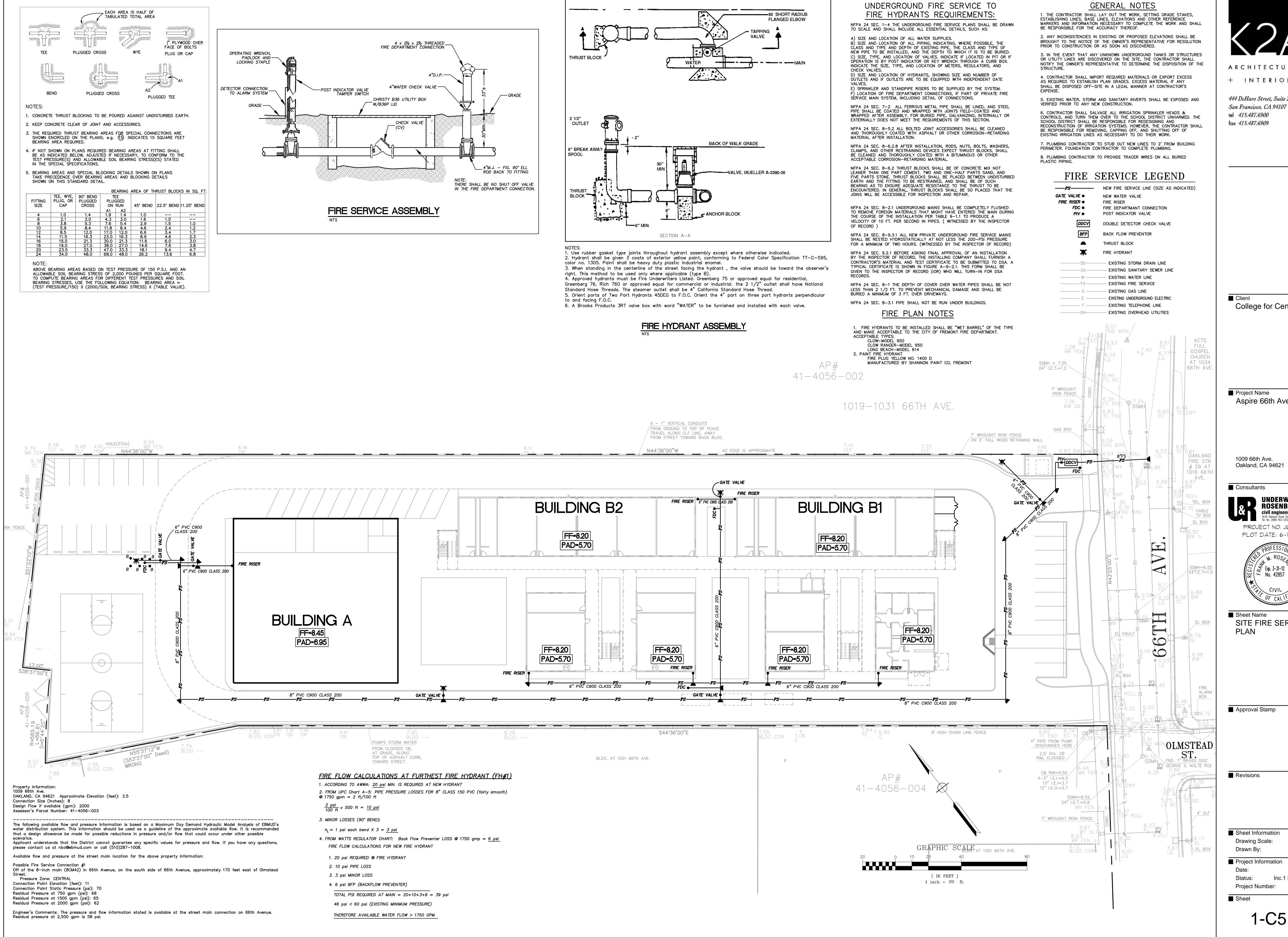
Approval Stamp

Revisions

Sheet Information Drawn By:

■ Project Information

Sheet



ARCHITECTURE

+ INTERIORS 444 DeHaro Street, Suite 220

College for Certain, LLC

Project Name Aspire 66th Ave

1009 66th Ave. Oakland, CA 94621

Consultants

PROJECT NO. JØ5Ø35 PLOT DATE: 6-16-2010

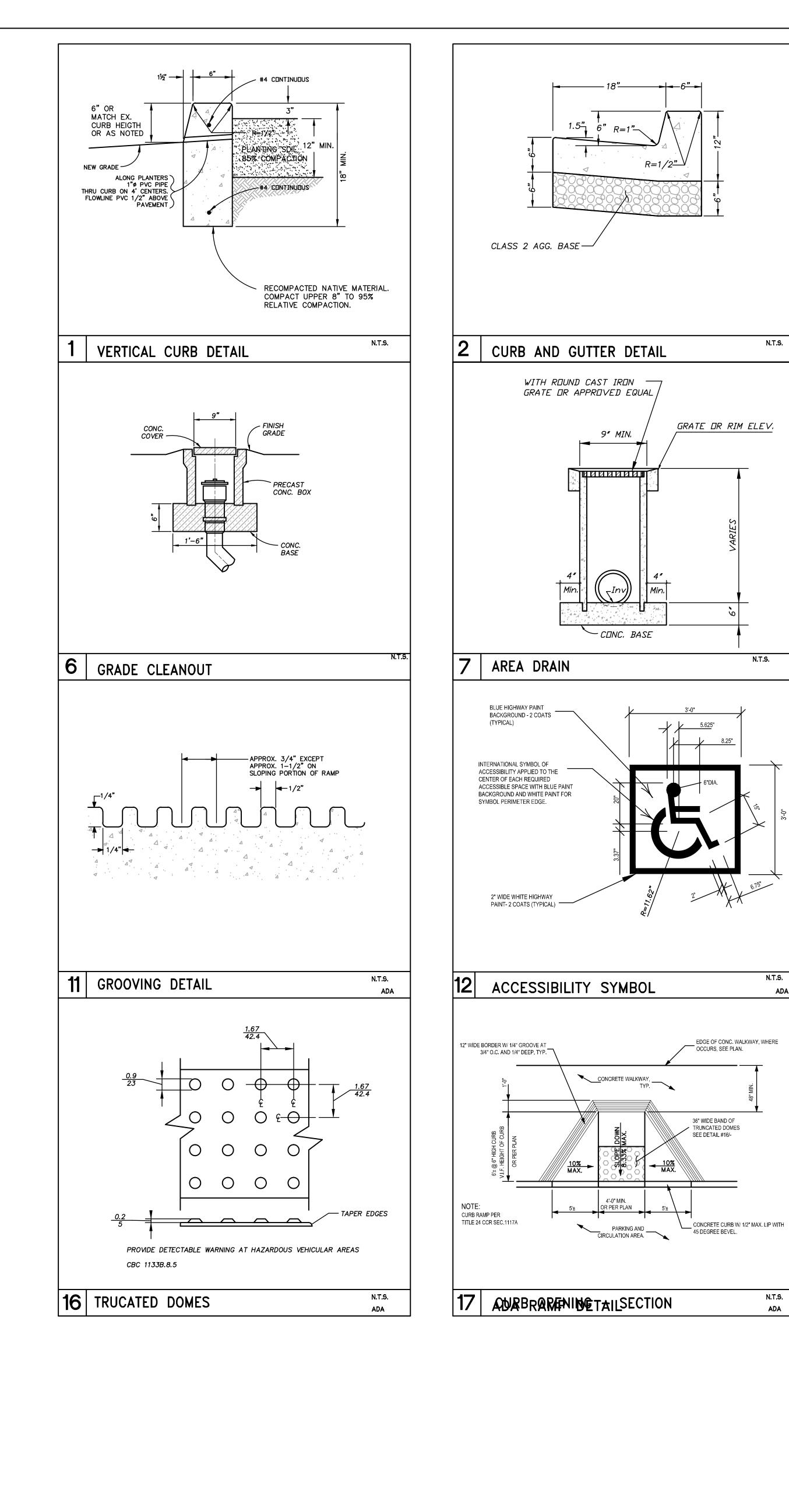
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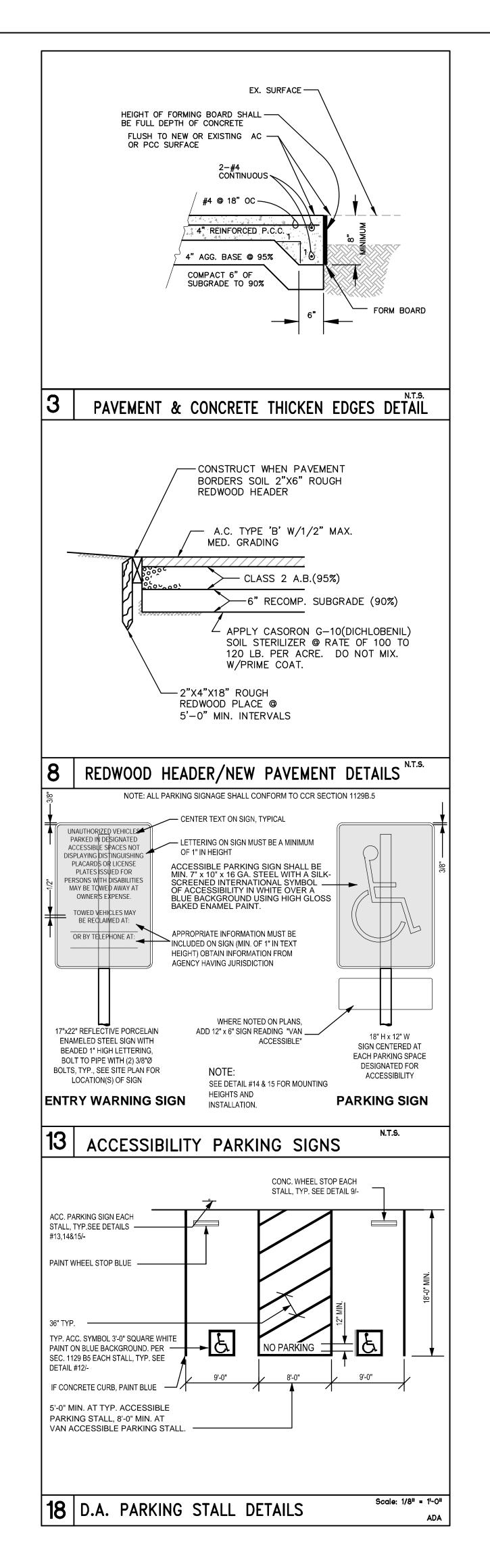
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Revisions

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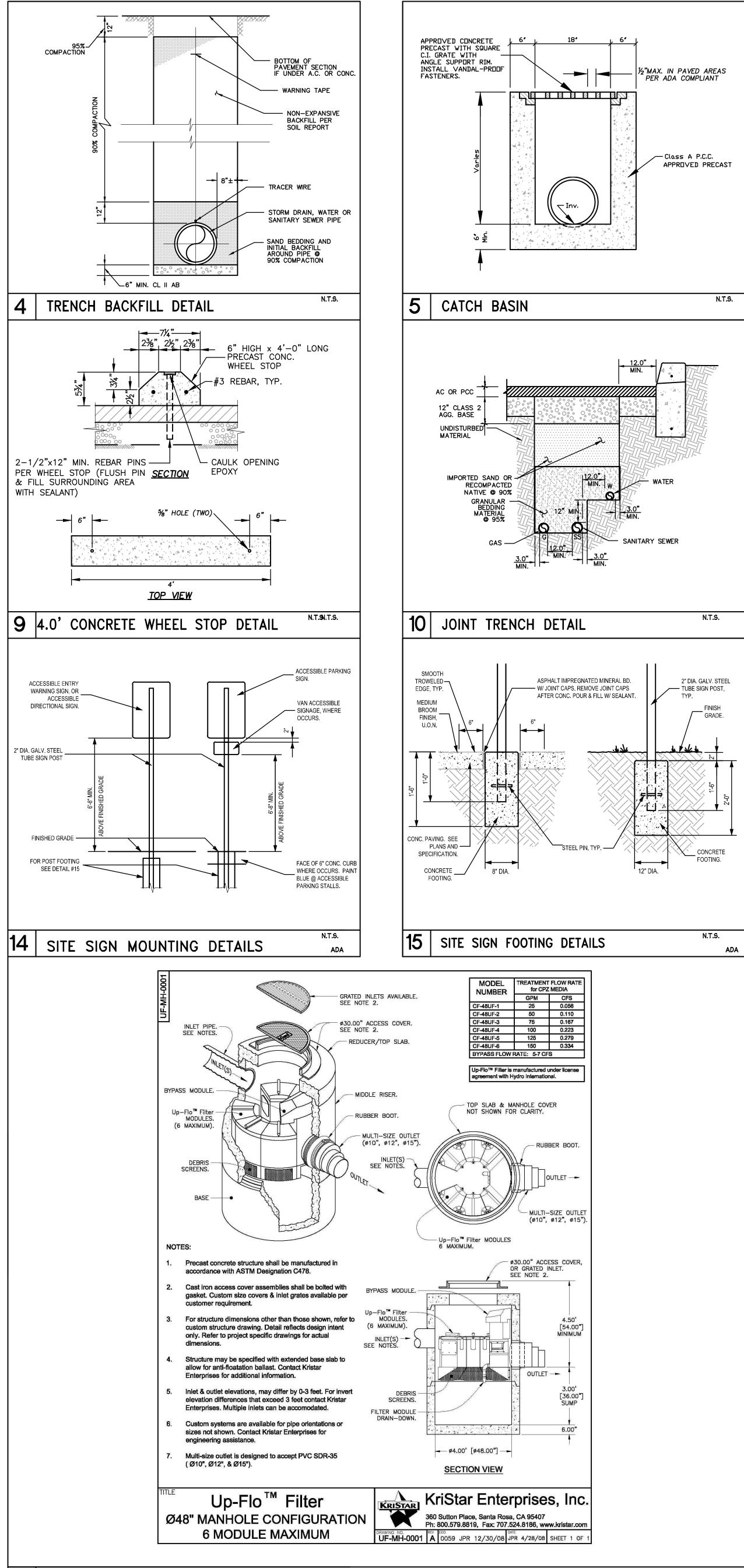
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ADA

ADA



19 RUN-OFF TREATMENT DETAILS



444 DeHaro Street, Suite 220 San Francisco, CA 94107 tel 415.487.6900 fax 415.487.6909

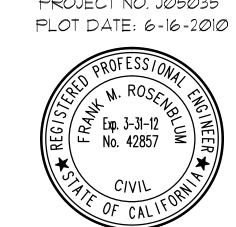
Client College for Certain, LLC

Project Name Aspire 66th Ave

1009 66th Ave. Oakland, CA 94621

Consultants

PROJECT NO. JØ5Ø35



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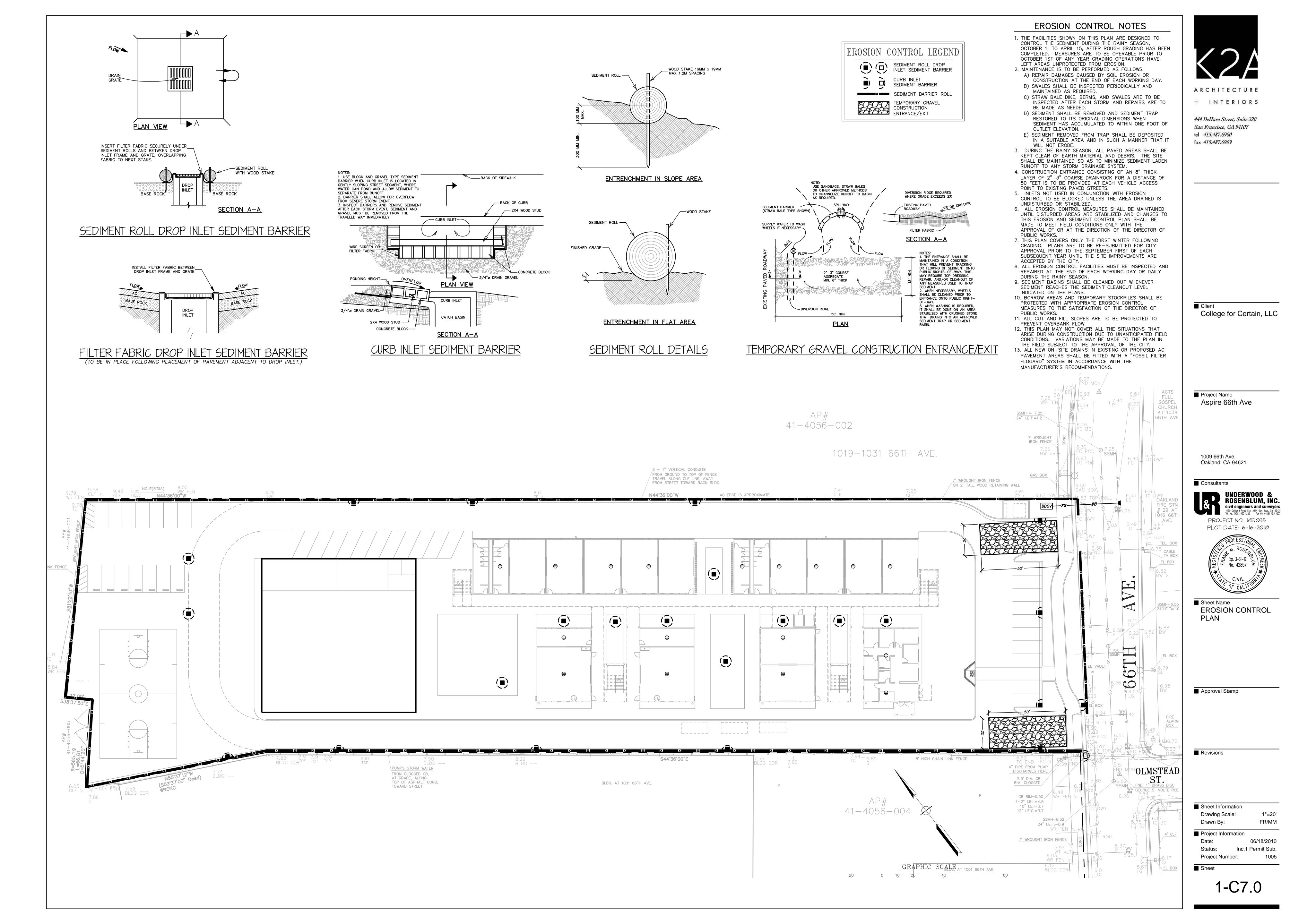
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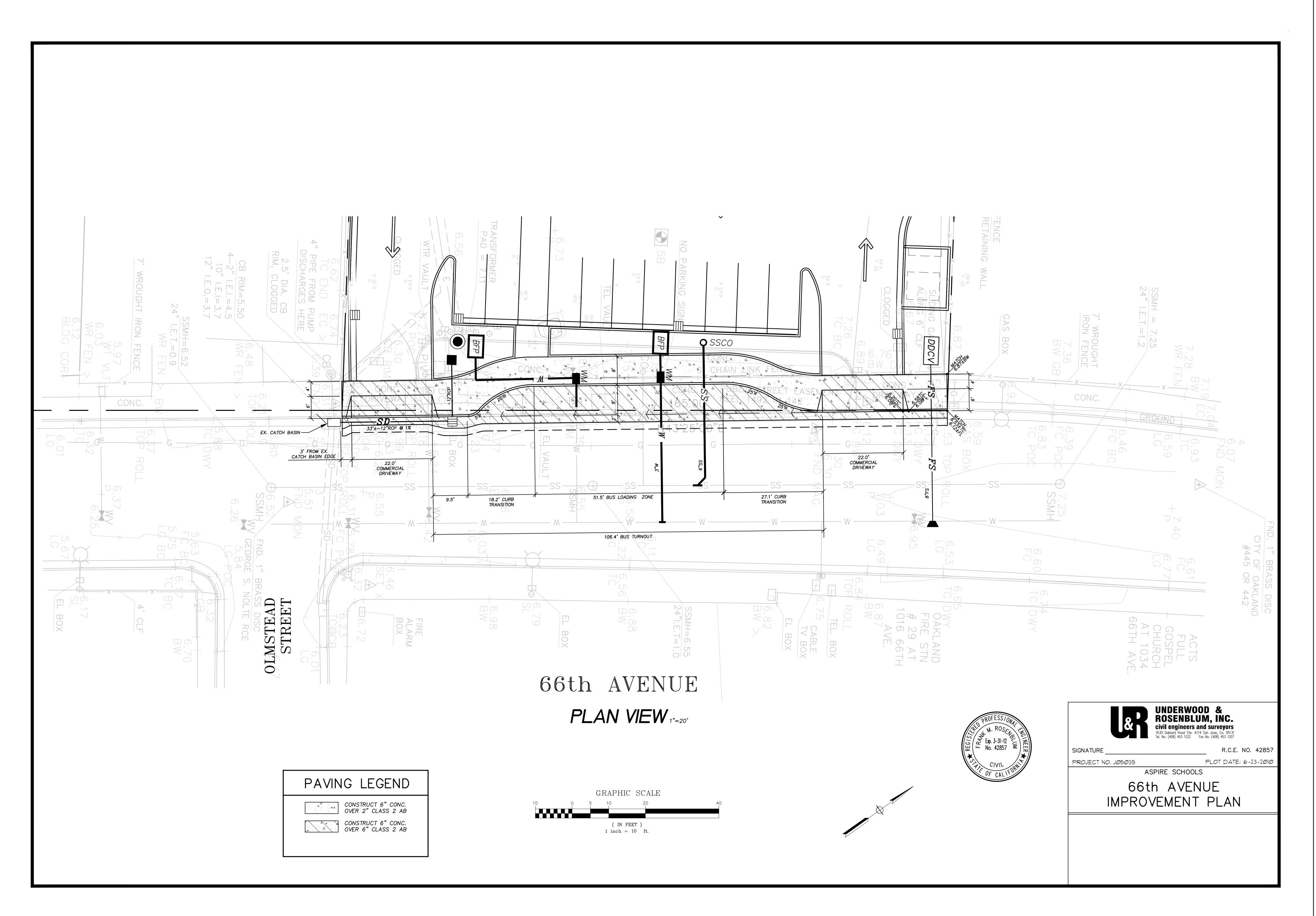
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444 DeHaro Street, Suite 220 San Francisco, CA 94107 tel 415.487.6900 fax 415.487.6909

■ Client
College for Certain, LLC

■ Project Name
Aspire 66th Ave

1009 66th Ave. Oakland, CA 94621

■ Consultants





Sheet Name
OFF-SITE STREET
IMPROVEMENT PLAN:
66TH AVENUE

Approval Stamp

■ Revisions

■ Sheet Information
Drawing Scale:

Drawn By: FR/MM

■ Project Information
Date: 06/18/2010
Status: Inc.1 Permit Sub.

Project Number: 1005

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Correspondence with USEPA

Trestler, Lauren

From: Goloubow, Ron

Sent: Friday, October 16, 2009 11:40 AM

To: Santos.Carmen@epamail.epa.gov; Wilson.Patrick@epamail.epa.gov

Cc: Gibbs, Alan; Seyfried, Scott; Jones, Michael **Subject:** FW: 66th Avenue, Oakland, CA - TSCA issues

Carmen - Thanks so much for reviewing the data for the subject Site. LFR would like to arrange for a conference call with you to discuss our approach to the project in response to the email you sent on October 13, 2009 (below). We are proposing that the conference call take place on either Wednesday, October 22, at 1200 Pacific Standard Time (PST) or Thursday, October 23 at 0900 PST.

The subject of the conference call will be to present and discuss LFR's conceptual approach to this project and will focus on the following specific issues:

- The scope of work to be presented in the Self-Implementing On-Site Cleanup and Disposal work plan (i.e. the scope of work to collect additional soil and/or concrete samples to assess PCBs in soil and concrete at the Site)
- Proposed building demolition and soil disposal plan

Please let me know which day and time works for you &-or Patrick Wilson.

Thanks Ron.

Ron Goloubow, P.G. LFR Inc., an ARCADIS Company 510-596-9550 Direct Dial 510-501-1789 Cell 510-652-4906 Facsimile ron.goloubow@lfr.com

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Tuesday, October 13, 2009 3:10 PM

To: Goloubow, Ron

Cc: Wilson.Patrick@epamail.epa.gov; Santos.Carmen@epamail.epa.gov

Subject: PCBs at Aspire Property (66th Avenue, Oakland, CA)

Importance: High

Dear Ron Goloubow:

Thank you for making contact with USEPA Region 9 (USEPA) to determine if the Toxic Substances Control Act (TSCA) regulations for polychlorinated biphenyls (PCBs) in 40 CFR Part 761 (the "PCB Regulations") apply to the Aspire property (site) on 66th Avenue (between East 14th Street and San Leandro Street) in Oakland. You work with LFR who is Aspire's consultant. Aspire plans to build a school (middle / high school combined) at its property. PCBs are present in soils at the site among other contaminants.

We believe that TSCA requirements apply to the cleanup of PCBs at the site based on the information we have reviewed in the LFR /Arcadis July 9, 2009 revised Corrective Action Plan (CAP). Section 4.1.1 of the CAP states that "[d]ocumented releases of hazardous materials at the Site include petroleum hydrocarbon compounds (from the former UST) and PCBs (presumably from their manufacture and service of transformers and other electrical equipment components)." We clarify that although soil sampling / analysis data presented in the CAP show PCBs mostly at concentrations below 50 mg/kg

(ppm) and one hot spot at 69.68 ppm PCBs, releases from at least Pacific Electric Motors (PEM) resulted in the PCB contamination at the site. Soils with PCB concentrations up to 45,470 ppm were excavated by PEM under the oversight of Alameda County Department of Environmental Health (ACDEH). Based on the CAP, Pacific Electric Motors operations involved manufacturing and servicing of transformers and other electrical equipment components. TSCA requirements apply at the site. Therefore, this message provides guidance on PCB cleanup options available under TSCA and some recommendations.

Based on the CAP (LFR / Arcadis) and as a prelude to the recommendations that we are making later in this message, we include below a brief summary of site operations and ownership.

- Pacific Electric Motors (PEM) occupied the site from 1949 to 2001.
- PEM constructed the two buildings that currently occupy the site: the Manufacturing / Office Building and the Warehouse.
- At the site, PEM was involved with manufacturing of specialty magnets, power supplies, and components; and repairing of transformers, motors, generators and magnets.
- In about 1975, PEM installed at the site a 2, 000-gallon gasoline underground storage tank.
- PEM may have stored vehicle lubricants and oil for vehicle maintenance.
- Among others, waste water discharges in the past included air compressor condensate.
- Highest documented concentration of PCBs in soils at the former PEM site is 45,470 mg/kg.
- Mo Dad Properties acquired the site in 2001; and the on-site buildings were occupied by Bay Area Powder Coatings.
 - Bay Area Coatings declared bankruptcy.
- Landeros Iron Works subleased the property from Bay Area Coatings and vacated the site in 2008.
- The site is currently vacant and the original structures still remain.

In addition to the above, we understand that in 1992 and 1993, PEM conducted soil investigations as required by ACDEH. Approximately, 400 cubic yards of soil that contained up to 45,470 mg/kg PCBs as Aroclor 1260 were excavated and disposed offsite. ACDEH had required PEM to meet a 1 mg/kg PCB level in soils as the excavation remedial goal. ACDEH issued a "No Further Action" letter to PEM after completion of the soil removal activities.

Current PCB Contamination

Based on the data presented in the CAP, PCB-contaminated soils are still present at the site: samples taken of the Northern Area have PCBs below 50 ppm (ranging from not detected to 21.34 ppm PCBs) and samples taken in the Southern Area show PCBs above 50 ppm (samples range from not detected to one sample at 69.68 ppm PCBs). The CAP does not provide the basis for the areas at the site that were investigated for PCBs and LFR believes the investigated areas were targeted based on the operations conducted at the site.

Lacking additional information on the site, it is uncertain if previous soil investigations for PCBs identified all potential PCB source areas (based on PEM and others that occupied the site) and if such investigations involved the entire 2.5-acre site. For example, it is uncertain if historic and most recent soil investigations included a PCB assessment in the area of the steam-cleaning sump where the water was found to contain traces of PCBs (CAP, Section 2.1.2). If the sump is still present at the site, is it made of concrete and if it is, have bulk concrete samples been collected from the concrete, and soil samples collected beneath and in proximity to the sump?

Discharges of "air compressor condensate" occurred at the site and these discharges may have contained PCBs depending on the age and type of compressor used and the oil contained in the compressor. Releases of oil from transformers and other electrical equipment potentially containing PCBs also occurred at the site. In addition, several types of oils were stored at the site some of which were used for vehicle maintenance. A possibility exists that some of these oils may have been hydraulic fluids (PCBs were also added to hydraulic oils in the past) or other oils (potentially containing PCBs) used to service other equipment on site like air compressors. Aroclor 1260, which is associated with transformer oils, hydraulic fluids, and other applications, was detected in soils at the site.

Section 8.1.1 (Site Management) of the "Implementation Plan" (Section 8.0) of the CAP states that building materials will be removed from the site and reference is made to materials such as lead-based paint and asbestos containing material (such as transite [asbestos concrete] pipes. We understand that building structures existing at the site are made of metal (on concrete slab) and will be demolished before construction of the school. We also understand that PEM constructed these buildings in the late 1940s.

Alternatives for PCB Cleanup

Based on the limited information that we have reviewed, cleanup of the site and demolition activities will involve the need to properly dispose of PCB remediation wastes (including bulk PCB remediation waste such as soils) and PCB bulk product wastes. The terms PCB remediation waste and PCB bulk product waste are defined in the PCB Regulations at 40 C.F.R. 761.3.

Section 761.61 maps out the requirements of the PCB Regulations for cleanup and disposal of PCB remediation wastes while section 761.62 sets out the requirements for disposal of PCB bulk product waste. Self-implementing procedures for cleanup and disposal of PCB remediation wastes can be found at 40 CFR 761.61(a) and the procedure for a risk-based disposal approval is found at 40 CFR 761.61(c). The

http://www.access.gpo.gov/nara/cfr/waisidx 08/40cfr761 08.html link will take you to the PCB regulations in the electronic Code of Federal Regulations after you paste it in your web browser. PCB remediation waste and PCB bulk product waste are defined in 40 CFR 761.3.

Adequate characterization of the site is required for the self-implementing procedure. See 40 C.F.R. 761.61(a)(2). The self-implementing procedures set out in section 761.61(a) may **not** be used to clean up surface or ground waters; sediments in marine and freshwater ecosystems; sewers or sewage treatment systems; any private or public drinking water sources or distribution systems; grazing lands; or vegetable gardens. See 40 CFR 761.61(a)(1).

Therefore, the site characterization in the notification submitted to USEPA should clearly explain what has been contaminated by PCBs and all reasonably foreseeable uses of the property given its proposed use as a school. For example, many schools in California have installed vegetable gardens as part of their educational curriculums and therefore the potential for asphalt or concrete being removed for a vegetable garden at some time in the future should be evaluated. The change in the use of the Aspire site is relevant to the required cleanup level and the procedures which apply. USEPA has the authority to require cleanup of a site, or portions of it, to more stringent cleanup levels than are otherwise required by the self-implementing procedures, based on the proximity to areas such as schools. See 40 CFR 761.61(a)(4)(vi).

The risk based option authorized by section 761.61(c) of the PCB Regulations requires a risk evaluation for on-site cleanup and disposal of PCB remediation waste in addition to the notification and certification requirements specified in subsection 761.61(a)(3). The risk based disposal option is used by parties when they want to cleanup a site, collect samples, or dispose of PCB remediation waste in a manner different than prescribed in section 761.61(a) or when the self-implementing procedures are not applicable.

Under both PCB cleanup options, a Notification and Certification must be submitted to USEPA in accordance with subsection 761.61(a)(3) of the PCB Regulations and this notification involves characterizing the site adequately. The certification required in subsection 761.61(a)(3) should include all of the information specified by that provision and a certification meeting all the requirements of sections 761.3 (defining certification) and 761.61(a)(3)(i)(E) of the PCB Regulations. For cleanups where the self-implementing procedure is allowable and the option being pursued, USEPA will respond in writing (approving of the self-implementing cleanup, disapproving of the self-implementing cleanup, or requiring additional information) within 30 calendar days. USEPA has no mandated time frame to approve a risk-based application for a PCB cleanup. Cleanup and verification of a cleanup conducted under the PCB self-implementing cleanup option must be conducted in accordance with all the applicable requirements in 761.61(a), including 761.61(a)(6).

PCB contaminated soils at the site that will be disposed offsite are PCB bulk remediation waste. Disposal of these soils should be based on as found (in situ) PCB concentrations, not on the concentration of the soil after it has been excavated and placed in a pile.

Other PCB remediation wastes expected to be generated as part of the cleanup include concrete surfaces at the site contaminated with PCBs, personal protective equipment, cleanup wastes, and liquids. Disposal requirements for these wastes are in 40 CFR 761.61(a)(5). In addition, decontamination of sampling and equipment and disposal of decontamination residues should be conducted in accordance with 40 CFR 761.79 (c), (d), (e), (f), and (g).

The CAP contains a good portion of the information required in the Notification and Certification which must be submitted to USEPA for either the self-implementing or risk based PCB cleanup options, but USEPA needs more detailed information. See below.

The extent of PCB contamination has to be clearly discussed as well as any information concerning PCB sources at the site. The extent of contamination is not clear to USEPA so the site investigation uncertainties mentioned earlier in this message should be addressed in the cleanup plan. The cleanup plan should present PCB analysis data as total PCBs and speciated Aroclors (e.g., Aroclor 1242, Aroclor 1260).

Recommendations

We recommend the following:

- The characterization of the Aspire site still contains data gaps and uncertainties. Some of these uncertainties were described earlier in this message. As required by 40 CFR 761.61(a)(2), characterize the Aspire site in more detail to provide USEPA with adequate information concerning the nature of the contamination, including:

 (a) kinds of materials contaminated; (b) a summary of the procedures used to sample contaminated and adjacent areas and a table or cleanup site map showing PCB concentrations measured in all pre-cleanup characterization samples. The summary must include sample collection and analysis dates. USEPA will require more detailed information including additional characterization sampling see below. (c) The location and extent of the identified contaminated area, including topographic maps with sample collection sites cross referenced to the sample identification numbers in the data summary. (d) A cleanup plan for the site, including schedule, disposal technology, and approach. This plan should contain options and contingencies to be used if unanticipated higher concentrations or wider distributions of PCB remediation waste are found or other obstacles force changes in the cleanup approach.
- Utilize Subpart N of the PCB Regulations, which sets out a method for collecting new site characterization data, for assessing the sufficiency of existing site characterization data.
- Utilize Subpart O to verify that cleanup levels have been met after characterization and cleanup have been conducted.
- Utilizing appropriate procedures as specified in the PCB Regulations, collect additional soil data at the Aspire site to determine if PCBs are present in other areas (e.g., steam cleaning sump) of the site. Additional soil samples should be collected in areas where PCBs may be a co-contaminant and in areas where PCB samples were not collected and TPH is or may be present and enhancing the solubility of PCBs in soils.
- Provide adequate information to characterize whether the PCBs at the Aspire site have migrated to groundwater (such as ground water samples).
- The July 9, 2009 revised CAP includes the ACDEH PCB cleanup level of 0.39 ppm for soils. The self implementing PCB cleanup regulations in 40 CFR 761.61(a)(4) requires a PCB cleanup level for high occupancy areas equal to or below 1 ppm without further restrictions, but USEPA has the authority to impose more stringent requirements if needed due to considerations such as proximity to a school. In some circumstances a cleanup goal lower than the level set by ACDEH might be appropriate. EPA has not yet made a determination regarding the appropriate cleanup level in this instance. If made available to USEPA, we will review the calculations and basis used in developing the 0.39 ppm PCB cleanup goal in the CAP. Whatever cleanup goal is ultimately adopted as the cleanup level for the TSCA cleanup, the owner of the property would be required to meet the cleanup level adopted for the TSCA cleanup.
- PCB bulk product waste: We believe that PCB bulk product waste will be generated during demolition of the structures at the site. Although a specific approval from USEPA is not necessary for removal and disposal of PCB bulk product waste, we recommend that the LFR / Arcadis PCB cleanup plan also include a section on removal and disposal of PCB bulk product waste. Given the age of the structures, we recommend a survey be done on these structure to determine PCB products that may be involved. For example the metal walls of the buildings may be made of metal siding that may be coated with a PCB coating like Galbestos. If manufactured with this coating the metal walls of the building would be a PCB bulk product waste.

I hope the above information is useful in preparing a PCB cleanup plan that meets TSCA requirements. Please call me if you have any questions concerning this message.

Sincerely,

Carmen D. Santos Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 Voice: 415.972.3360 Facsimile: 415.947.3553

Trestler, Lauren

From: Goloubow, Ron

Sent: Tuesday, October 20, 2009 7:26 PM

To: Santos.Carmen@epamail.epa.gov; Wilson.Patrick@epamail.epa.gov

Cc: Charles Robitaille; Gibbs, Alan; Seyfried, Scott; Jones, Michael; Goloubow, Ron

Subject: 1009 66th Ave. Oakland, CA - soil sample rationale

Attachments: 1009-66th Ave, Oakland, CA - PCB Sample Location Rational 10-19-2009.pdf; Figure

1-09155.00 F1.pdf; PCBs in soil rev 1.pdf

Carmen - The attached provides the rationale for the proposed soil and concrete sample locations to be collected for polychlorinated biphenyls (PCBs) analysis at the subject Site. I will follow up with you Wednesday October 21, 2009 in the early afternoon to find out what progress the EPA has made regarding the review of the "conceptual" sampling plan for this project. If you have any questions regarding this letter or the project in general, please do not hesitate to contact me at 510-596-9550.

Thanks Ron.

Ron Goloubow, P.G.
Senior Associate Geologist
LFR Inc., an ARCADIS Company
1900 Powell Street, 12th Floor
Emeryville, CA 94608-1827
510-596-9550 Direct Dial
510-501-1789 Cell
510-652-4500 Main Number
510-652-4906 Facsimile
ron.goloubow@lfr.com
Visit us at www.lfr.com

Trestler, Lauren

From: Goloubow, Ron

Sent: Friday, October 23, 2009 7:01 PM

To: Santos.Carmen@epamail.epa.gov; Wilson.Patrick@epamail.epa.gov

Cc: Gibbs, Alan; Seyfried, Scott; Goloubow, Ron; Jones, Michael; Charles Robitaille

Subject: 1009 66th Ave. Oakland, CA Self-Implementing Cleanup Plan

Attachments: 1009 66th Ave-Oakland, CA-TSCA Letter -SICP 10-2309.pdf; Fig 1 Proposed Charter School

Site Location.pdf; Figure 2 SICP.pdf

In preparation of our meeting on Tuesday afternoon please find the Self-Implementing Cleanup Plan for the subject Site. As we discussed, LFR anticipates initiating this cleanup on a "fast track" schedule to meet the client's loan and construction milestones, which are less than 30 days after submittal of this notification.

We here at LFR and Aspire Charter Schools appreciate your time assisting us with our accelerated schedule and look forward to meeting with you on Tuesday. If you have any questions or need any more information prior to our meeting please do not hesitate to contact me.

Ron.

Ron Goloubow, P.G.
Senior Associate Geologist
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1900 Powell Street, 12th Floor
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ron.goloubow@lfr.com
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Trestler, Lauren

From: Goloubow, Ron

Sent: Friday, November 06, 2009 1:30 PM
To: Santos.Carmen@epamail.epa.gov
Cc: Gibbs, Alan; Goloubow, Ron

Subject: 1009 66th Ave. Oakland, CA - soil, concrete, & bldg material sampling

Attachments: bldg mat maps_001.pdf; concrete & soil samples_001.pdf; Test America Building Materials

Sample results.pdf; Test America Soil - Concrete Sample results-10-2009.pdf

Carmen the following items are attached:

Two maps (Figures 3 and 5) illustrate the locations of the five samples of building materials that were collected from building 1 (the large warehouse) on 10-29-2009. I have also written in the analytical results of the PCB analyses on these maps.

One map (Figure 2) that illustrates the locations of the 12 soil samples collected approximately 0.5 to 1.5 feet bgs from soil borings SB-1 through SB-12 that are located across the property. As we discussed, each of these soil samples did not contain PCB above laboratory reporting limits.

Also illustrated on this map (Figure 2) are the locations of concrete samples collected from inside the building 1 (the large warehouse; SB-5, SB-6, SB-8, and SB-10). Concrete sample SB-9 was collected from an oily stained area on the concrete pad for the air compressor.

I have also attached the laboratory reports for these samples.

The surveyor is on site locating the samples so that the exact soil and concrete sample locations may be revised.

I will contract you later today around 1:00 pm for an update on this project. If you have any questions in the interim please do not hesitate to contact Alan or me.

Thanks Ron.

Ron Goloubow, P.G.
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1900 Powell Street, 12th Floor
Emeryville, CA 94608-1827
510-596-9550 Direct Dial
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510-652-4906 Facsimile
ron.goloubow@lfr.com
Visit us at www.lfr.com



November 18, 2009

003-09155-08 transmitted via email only

Ms. Carmen Santos U.S. Environmental Protection Agency, Region 9 Mail Code WST-5 75 Hawthorne Street San Francisco, CA 94105

Subject: Conditional Approval of the Toxic Substance Control Act Self-Implementing Cleanup

Notification and Certification, Former Pacific Electric Motors Facility, 1009 66th

Avenue in Oakland, California

Dear Ms. Santos:

The property owner, Aspire Public Schools (Aspire) and LFR Inc., an Arcadis Company (LFR) would like to thank the staff of the U.S. Environmental Protection Agency (USEPA) for the letter providing the conditional approval of the Self-Implementing Cleanup Plan (SICP; dated October 23, 2009) with conditions at the former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California (the "Site" [Figure 1] letter dated, November 13, 2009; the "EPA Letter"). The excavation of the polychlorinated biphenyl (PCB) affected soil began at the Site in accordance with the SICP and the EPA Letter on November 4, 2009 (Figure 2).

Aspire and LFR's intention to comply with the parameters of the conditional approval are provided as follows:

1. Certification Signed by LFR & Aspire

A revised certification for this project signed by representatives of both Aspire and LFR is attached.

2. Pre-Demolition and Post-Demolition PCB survey

The pre-demolition and post-demolition sampling plan for building materials is provided as an attachment to this letter.



3. Sampling & Analysis Plan

As acknowledged in the EPA Letter, LFR transmitted a Sampling and Analysis Plan for the Site (the "SAP") on November 5, 2009. This SAP focused on the objectives, methods, procedures associated with the soil samples to be collected and analyzed in conjunction with pre-demolition soil characterization and post-remediation soil sampling. As requested, the pre-demolition and post-demolition sampling plan for building materials is provided as an attachment of this letter.

4. Sequence of Pre-Cleanup PCB Soil Characterization; Pre-Demolition Sampling; Soil Remediation; Soil Clean-Up Verification

Aspire and LFR will complete the project under the following sequence of work:

- Pre-Cleanup PCB Soil Characterization The scope of this work was completed in accordance with the SAIC and the SAP
- Pre-Demolition Sampling this sampling was completed in accordance with the building materials SAP provided above (in this letter).
- Soil Remediation Site remedial actions are taking place at the Site in accordance with the Revised Corrective Action Plan, the SAIC, and the SAP
- Soil Clean-Up Verification and Post-Demolition Sampling Soil clean up verification and post-demolition sampling will be conducted in accordance with the procedures provided in the CAP, SAP, and SAIC. As provided in the SAIC, post-demolition soil sampling regarding the removal of the sewer pipelines at the Site will take place by collecting soil samples adjacent to the sanitary and storm sewer pipelines that are to be abandoned as part of the redevelopment of the Site. If material (liquid or solid) is present in the sewer pipes, samples will be collected for PCB analysis (EPA test method 8082) so that the material may be disposed of in accordance with the procedures provided in the EPA letter (see item 5 below).
- Following the demolition of the large warehouse building, soil samples will be collected from the ground surface (surface soil samples) at areas of the Site that were unpaved during demolition activities. Soil samples will be collected on a 75-foot grid in the unpaved areas. Samples will be collected and analyzed using methods provided in the SAP.
- In addition to samples of material from in the sewer pipeline(s) and as provided in the SAIC, soil samples will be collected every approximately 50 feet of sewer line approximately 1 to 2 feet below the pipeline invert. The soil samples will be analyzed for PCBs in accordance with the SAP. If soil containing greater than 0.13 milligrams per kilogram (mg/kg) is detected in the soil samples, additional soil will be removed and the additional confirmation soil samples will be collected for analysis in accordance with the SAP.



5. PCB Remediation Waste

Aspire has the following EPA identification number for this property: CAC002647778. Aspire and LFR will dispose of the soil in accordance with the procedures provided in the EPA letter. As such (porous and non-porous) building materials will be disposed of in accordance with the following regulations:

§ 761.61 PCB Remediation Waste

Bulk PCB remediation waste may be sent off-site for decontamination or disposal in accordance with this paragraph, provided the waste is either dewatered on-site or transported offsite in containers meeting the requirements of the DOT Hazardous Materials Regulations (HMR) at 49 CFR parts 171 through 180. (1) Removed water shall be disposed of according to paragraph (b)(1) of this section.

- (2) Any person disposing off-site of dewatered bulk PCB remediation waste shall do so as follows:
- (i) Unless sampled and analyzed for disposal according to the procedures set out in § 761.283, 761.286, and 761.292, the bulk PCB remediation waste shall be assumed to contain \geq 50 ppm PCBs.
- (ii) Bulk PCB remediation wastes with a PCB concentration of < 50 ppm shall be disposed of in accordance with paragraph (a) (5)(v)(A) of this section.
- (iii) Bulk PCB remediation wastes with a PCB concentration \geq 50 ppm shall be disposed of in a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA, or a PCB disposal facility approved under this part.

Analytical results of soil samples collected from soil boring 4B located in proposed excavation area PCB-EXC1, contained PCBs at a concentration of greater than 50 mg/kg (see Figure 2). Based on theses analytical results, soil excavated from this area will be transported off-site and disposed of at Waste Management's Kettleman Hills Landfill.

Analytical results of soil samples collected from soil borings located in proposed excavation areas PCB-EXC2, PCB-EXC3, and PCB-EXC4 of the Site contained PCBs at a concentration of less than 50 mg/kg (see Figure 2). Based on theses analytical results, this soil will be transported offsite and disposed of at Republic Services' Vasco Road Landfill located in Livermore, California.

§ 761.62 Disposal of PCB Bulk Product Waste

(b) Disposal in solid waste landfills. (1) Any person may dispose of the following PCB bulk product waste in a facility permitted, licensed, or registered by a State as a municipal or non-municipal non-hazardous waste landfill.



Based on the analytical results of samples collected from the various building materials at the Site, the building materials from the Site generated from demolition activities will be transported off-site and disposed of at Republic Services' Vasco Road Landfill located in Livermore, California.

6. Measures to Prevent Exposure of the Neighboring Community to Air Borne Particulates

In accordance with the SICP, the following provides the details regarding the air monitoring plan for the proposed excavation and demolition activities that are proposed for the Site.

Air Monitoring and Dust Control Measures

Real-time aerosol monitoring devices (mini-RAM) will be used to monitor total dusts generated during site work. If dust in excess of background levels (greater than 0.25 milligram per cubic meter [mg/m³] above background levels) is observed for a sustained period of time (greater than 5 minutes), appropriate dust suppression measures (e.g., spraying soil with water) will be undertaken.

A total dust action level of 0.25 mg/m³ above background levels that is sustained for 15 minutes would be conservative for the various COPCs detected on the Site that would be likely to adhere to windblown dust and protective of the on-site workers and members of the surrounding community.

Field staff will obtain and document total dust readings from the mini-RAM throughout each work day when affected soil excavation activities are occurring on the Site. These readings will be obtained from air monitoring stations established along the Site's perimeters (a total of 5 stations; see Figure 2).

In addition to monitoring for total dust using at least four fixed air monitors, equipped with a mini-RAM, Personal Air Monitors (PAMs) used to collect air samples. The air samples will be collected on cassettes (media) that will be submitted to a laboratory for analysis of PCBs, arsenic, lead, and benzene. The air samples will be collected each work day when affected soil excavation activities and site demolition activities are occurring on the Site. Air monitoring stations will be at locations illustrated on Figure 2 (attached).

Air samples to be analyzed for PCBs will be collected on laboratory supplied filter tubes equipped with a solid sorbent material comprised of 13-mm glass fiber and Florisil. The samples media will be provided by and the samples will be an analyzed by EMSL Analytical, Inc. located in Westmont, New Jersey. Details regarding the collection and analytical methods for the air sample samples are provided in the attached documentation.



Public Notification

The public participation document mailed by the Alameda County Environmental Health has been laminated and is posted in two places along the fence that is adjacent to the public right-of way along 66th Avenue.

7. Revised Clean-up Level for PCBs in Soil

Aspire and LFR will remove soil containing PCBs at concentrations exceeding 0.13 mg/kg. If soil containing concentrations of PCBs greater than 0.13 mg/kg cannot be removed from the Site that area will be documented as described under item 9. Risk Management Plan and Deed Notice below.

8. Cap for Site

In accordance with the development plan for the Site, the entire property will be capped with either building structures, asphalt, or concrete. Prior to developing the Site, a minimum of 2 feet of imported fill will be placed and compacted as backfill in areas where affected soil has been previously removed from the Site. In addition, areas of the Site that will be redeveloped for vehicular traffic or structures, 8 to 12 inches of base rock will be imported to meet the geotechnical requirements of the redevelopment project.

9. Risk Management Plan and Deed Notice

A risk management plan will be prepared for the Site and a notice will be placed on the deed in accordance with item 9 of the EPA Letter.

10. Record Keeping and PCB Clean-Up Report

Documentation associated with the remediation of the PCB-affected soil and building materials will be retained and the PCB Clean-Up Report will be prepared in accordance with item 9 of the EPA Letter.

11. Restoration of the Site

The Site will be restored in accordance with the CAP, the SICP, and the EPA letter.



Following your review of this letter, please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

Alan D. Gibbs, P.G., C.HG.

Vice President/Principal Hydrogeologist

Ron Goloubow, P.G.

Senior Associate Geologist

Attachments

Figures 1 and 2 Certification

Sampling Plan for Building Materials

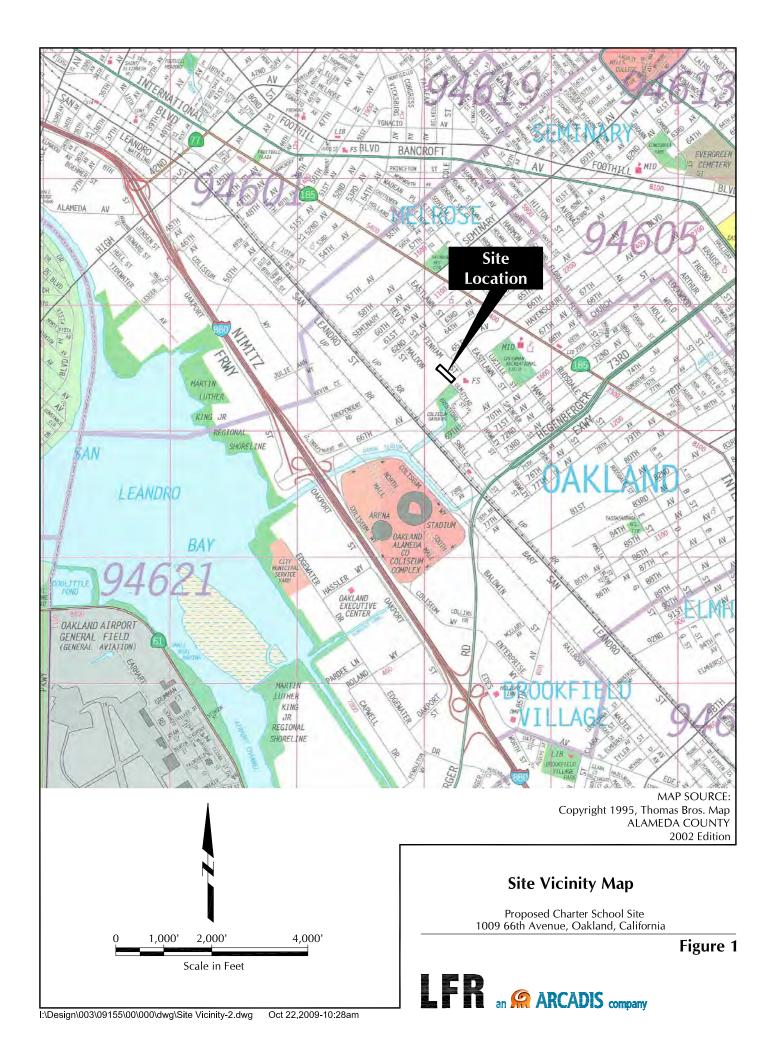
Air Monitoring; Sample Analysis Methods

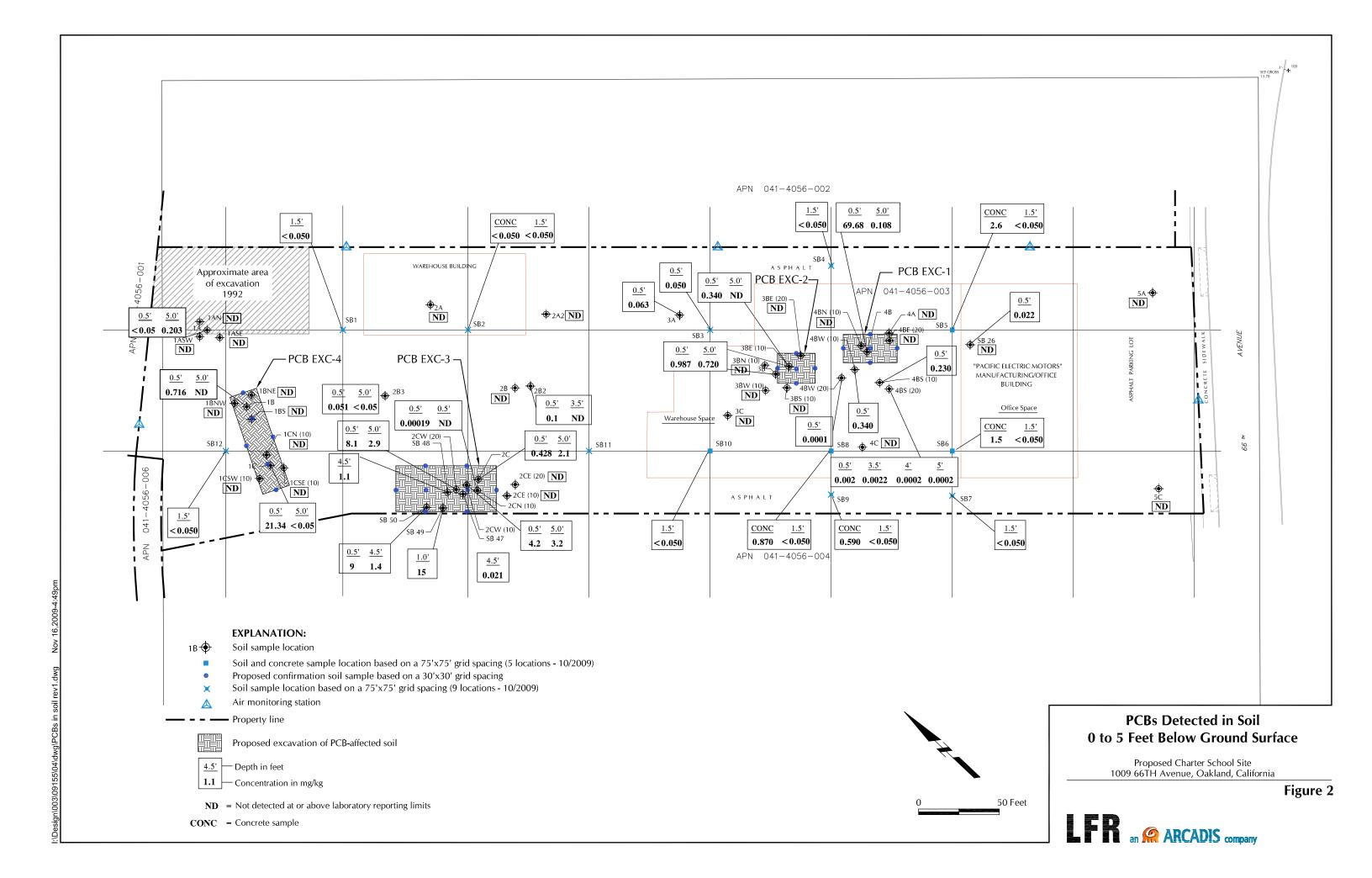
cc: Mr. Mike Barr- Aspire Charter Schools

Charles Robitaille - Pacific Charter Schools

Paresh Khatri - Alameda County Department of Environmental Health

FIGURES





TSCA CERTIFICATION

Certification Statement

Owner: Aspire Public Schools

Parties Conducting Cleanup: Arcadis and Innovative Construction Solutions Project: Former Pacific Motors Facility – 1009 66th Avenue, Oakland, CA

In accordance with 761.61(a)(3)(i)(E); I, Michael Barr, hereby certify, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the presence, concentrations, and extent of polychlorinated biphenyl- (PCB) impacted media for Former Pacific Motors Facility – 1009 66th Avenue, Oakland, CA are on file and available for USEPA review at the following location:

LFR Inc. an Arcadis Company Contact: Ron Goloubow

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

By: Michael Barr - Aspire Public Schools

Date: 11/9/09

By:

- FOI CHIC

Ronald E. Goloubow - LFR Inc. An Arcadis company

BUILDING MATERIALS SAMPLING PLAN

Building Materials Sampling Plan Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California

On behalf of Aspire Public Schools (Aspire) LFR Inc. an Arcadis company (LFR) has prepared this Building Materials Sampling Plan (BMSP). The BMSP provides the methods used by LFR to assess the presence of polychlorinated biphenyls (PCBs) in the building materials in the two buildings at located at the former Pacific Electric Motors Facility located at 1009 66th Avenue in Oakland, California. The purpose of the BMSP was to provide data regarding the presence of PCBs in the building materials at the Site. The data collected will be used to assess disposal methods for the building materials following demolition of the two buildings currently located at the Site.

During the survey, LFR attempted to identify and collect samples of the building materials that may contain PCBs in preparation for the demolition of the buildings. The building materials survey was conducted to comply a request from us U.S. Environmental Protection Agency (U.S. EPA) to determine if the building materials in the buildings at located at the Site contain PCBs.

The survey encompassed visible and accessible interior areas of the two subject buildings. To assess the presence of PCBs in the building materials LFR collected representative samples of the following materials:

Window Caulk
Paint (or painted surfaces)
Concrete
Concrete Caulk
Roofing material

Sample Collection, Handling and Documentation

Sample procedures described in this section will be used for sample collection, shipping, analysis, and disposal. Each sample of the building materials will be collected using hand tools and the sample will be placed in a laboratory supplied glass jar. Sample containers will be 4 or 8 ounce laboratory supplied glass jars, and no preservative will be used. The sample container will be labeled with the sample identification, the time and date of collection, the analysis requested, and the initials of the sampler. The samples will be stored in an ice-chilled cooler and submitted to the laboratory under strict chain-of-custody protocols. The sample identification will reference the type of building material and location that the sample was collected (i.e. window caulking-building 1). The location of the sample and the sample identification will be recorded on a map at the time of collection. LFR shall coordinate with the laboratory for the delivery of collected soil samples under chain-of-custody protocols for chemical analysis.

Concrete Sample Collection Methods

In accordance with EPA Site Revitalization Guidance, proposed concrete samples will be collected by drilling a nominal one-inch diameter hole using a rotary impact hammer drill to generate a fine concrete powder suitable for analysis. The powder is to be placed in a laboratory supplied sample container for laboratory analysis. The procedure can be used to collect concrete samples within the upper 6 inches of concrete at each proposed location. As with the soil samples, the concrete samples submitted to the laboratory will be labeled with the sample identification number, the time and date of collection, the analysis requested, and the initials of the sampler. The samples will be stored in an ice-chilled cooler and submitted to the laboratory under strict chain-of-custody protocols. LFR shall coordinate with the laboratory for the delivery of collected soil samples under chain-of-custody protocols for chemical analysis.

Analytical Methods

The samples of the building materials will be submitted for PCB analyses using USEPA SW-846 Method 8082.

Sampling Equipment Decontamination

Sampling equipment cleaning procedures are described in this section. Specifications for standard cleaning materials referred to in this section are as follows:

- <u>Soap</u> will be a standard brand of phosphate-free laboratory detergent such as Liquinox. Use of other detergent must be justified and documented in the field logbooks.
- <u>Tap water</u> may be used from any municipal water treatment system. Use of an untreated potable water supply is not an acceptable substitute for tap water.
- Organic/analyte free water is defined as tap water that has been treated with activated carbon and deionizing units.

Improperly handled cleaning solutions may easily become contaminated. Storage and application containers must be constructed of the proper materials to ensure their integrity. Following are acceptable materials used containing the specified cleaning solutions:

- <u>Soap</u> must be kept in clean plastic, metal, or glass containers until used. It should be poured directly from the container during use.
- <u>Tap water</u> must be kept in clean tanks, hand pressure sprayers, and squeeze bottles, applied directly from a hose.
- <u>Analyte free water</u> must be stored in clean glass, stainless steel, or plastic containers that can be closed prior to use. It can be applied form plastic squeeze bottles.
- Organic/analyte free water must be stored in clean glass, Teflon®, or stainless steel containers prior to use. It may be applied using Teflon® squeeze bottles.

Sampling Equipment Decontamination Procedure

The following procedures are to be used for all sampling equipment (hand tools or power tools). When appropriate disposable equipment (one time use) will be used :

- 1. Clean with tap water and soap using a brush if necessary to remove particulate matter and surface films.
- 2. Rinse thoroughly with tap water
- 3. Cover the equipment with plastic. Equipment stored overnight should be wrapped in aluminum foil and covered with clean, unused plastic.

AIR SAMPLE ANALYTICAL METHODS

FORMULA: Table 1 CAS: Table 1 RTECS: Table 1 MW: Table 1

METHOD: 1501, Issue 3 **EVALUATION: Full** Issue 1: 15 August 1990 Issue 3: 15 March 2003

OSHA: Table 2 **PROPERTIES:** Table 1

NIOSH: Table 2 ACGIH: Table 2

SYNONYMS: Group A: benzene toluene ethylbenzene o-xylene m-xylene p-xylene

(Synonyms

-MAX:

Table 3

in Table 1) Group B: cumene p-tert-butyltoluene α-methylstyrene B-methylstyrene stvrene

> **SAMPLING MEASUREMENT**

> > ANALYTE:

INJECTION

SAMPLER: SOLID SORBENT TUBE **TECHNIQUE:** GAS CHROMATOGRAPHY, FID

(coconut shell charcoal, 100 mg/50 mg)

FLOW RATE: Table 3 **DESORPTION:** 1 mL CS₂, stand 30 min with agitation

VOL-MIN: Table 3

VOLUME: 1 μL (Group A: split 5:1;

SHIPMENT: Group B: split 1:1) Routine

SAMPLE **TEMPERATURE**

Table 3

-INJECTION: 250 °C STABILITY: 30 days @ 5°C 300 °C -DETECTOR:

BLANKS: -COLUMN: Group A: 40 °C (10 min) to 230°C 10% of samples

(10 °C/min)

Group B: 35°C (8 min) to 225°C

(10°C/min)

CARRIER GAS: He @ 2.6 mL/min **ACCURACY**

COLUMN: Capillary, fused silica **RANGE STUDIED:**

Group \acute{A} : 30m x 0.32-mm ID; 1- μ m film

100% PEG or equivalent

Hydrocarbons listed above

BIAS: Table 3 Group B: 30m x 0.53-mm ID; 3-µm film crossbonded® 35% diphenyl 65% **OVERALL PRECISION (Ŝ,T):** Table 3

dimethyl polysiloxane or equivalent

ACCURACY: Table 3 **CALIBRATION:** Solutions of analytes in CS2

> RANGE: Table 4 ESTIMATED LOD: Table 4

PRECISION (5,): Table 4

APPLICABILITY: This method is for peak, ceiling, and TWA determinations of aromatic hydrocarbons. Interactions between analytes may reduce breakthrough volumes and affect desorption efficiencies. Naphthalene, originally validated in S292 [4], failed to meet acceptable desorption efficiency recovery and storage stability criteria at the levels evaluated in this study. However, the application of this method to naphthalene levels at or near the REL/PEL continues to meet acceptable recovery criteria. Styrene failed to meet acceptable recovery criteria at the two lowest levels evaluated in this study (highest level to meet the criteria was 181 µg/sample).

INTERFERENCES: Under conditions of high humidity, the breakthrough volumes may be reduced. Other volatile organic compounds such as alcohols, ketones, ethers, and halogenated hydrocarbons are potential analytical interferences.

OTHER METHODS: This method updates NMAM 1501 issued on August 15, 1994 [1] which was based upon P&CAM 127 (benzene, styrene, toluene, and xylene) [2]; S22 (p-tert-butyltoluene) [3]; S23 (cumene) [3]; S29 (ethylbenzene) [3]; S26 (α-methylstyrene) [3]; S30 (styrene); S311 (benzene) [4]; S343 (toluene) [4]; and S318 (xylenes) [4].

REAGENTS:

- 1. Carbon disulfide*, low benzene, chromatographic quality.
- 2. Analytes, reagent grade.
- 3. Helium, prepurified and filtered.
- 4. Hydrogen, prepurified and filtered.
- 5. Air, prepurified and filtered.
 - * See SPECIAL PRECAUTIONS

EQUIPMENT:

- Sampler: glass tube, 7 cm long, 6-mm OD, 4-mm ID, flame-sealed ends, containing two sections of activated coconut shell charcoal (front = 100 mg, back = 50 mg) separated by a 2-mm urethane foam plug. A silylated glass wool plug precedes the front section and a 3-mm urethane foam plug follows the back section. Tubes are commercially available.
- 2. Personal sampling pump, 0.01 to 1.0 L/min (Table 3), with flexible connecting tubing.
- 3. Gas chromatograph, FID, integrator, and columns (page 1501-1).
- 4. Autosampler vials, glass, 1.8 mL, with PTFE-lined caps.
- 5. Pipets, 1-mL, and pipet bulb.
- 6. Syringes, 10-μL, 25-μL, and 250-μL.
- 7. Volumetric flasks, 10-mL.

SPECIAL PRECAUTIONS: Carbon disulfide is toxic and extremely flammable (flash point = -30°C), benzene is a suspect carcinogen. Prepare standards and samples in a well ventilated hood.

SAMPLING:

- 1. Calibrate each personal sampling pump with a representative sampler in line.
- 2. Break the ends of the sampler immediately before sampling. Attach sampler to personal sampling pump with flexible tubing.
- 3. Sample at an accurately known flow rate between 0.01 and 0.2 L/min for a total sample size as shown in Table 3.
- 4. Cap the samplers with plastic (not rubber) caps and pack securely for shipment.

SAMPLE PREPARATION:

- 5. Place the front and back sorbent sections of the sampler tube in separate vials. Include the glass wool plug in the vial along with the front sorbent section.
- 6. Add 1.0 mL eluent to each vial. Attach crimp cap to each vial immediately.
- 7. Allow to stand at least 30 min with occasional agitation.

CALIBRATION AND QUALITY CONTROL:

- 8. Calibrate daily with at least six working standards from below the LOD to 10 times the LOQ. If necessary, additional standards may be added to extend the calibration curve.
 - a. Add known amounts of analytes to carbon disulfide solvent in 10-mL volumetric flasks and dilute to the mark. Prepare additional standards by serial dilution in 10-mL volumetric flasks.
 - b. Analyze together with samples and blanks (steps 11 through 12).
 - c. Prepare calibration graph (peak area of analyte vs. µg analyte per sample).

- 9. Determine desorption efficiency (DE) at least once for each batch of charcoal used for sampling in the calibration range (step 8).
 - a. Prepare three tubes at each of five levels plus three media blanks.
 - b. Inject a known amount of DE stock solution (5 to 25 µL) directly onto front sorbent section of each charcoal tube with a microliter syringe.
 - c. Allow the tubes to air equilibrate for several minutes, then cap the ends of each tube and allow to stand overnight.
 - d. Desorb (steps 5 through 7) and analyze together with standards and blanks (steps 11 and 12).
 - e. Prepare a graph of DE vs. µg analyte recovered.
- 10. Analyze a minimum of three quality control blind spikes and three analyst spikes to insure that the calibration graph and DE graph are in control.

MEASUREMENT:

11. Set gas chromatograph according to manufacturer's recommendations and to conditions given on page 1501-1. Inject a 1-µL sample aliquot manually using the solvent flush technique or with an autosampler. Note: If peak area is above the linear range of the working standards, dilute with solvent, reanalyze, and apply the appropriate dilution factor in the calculations.

Analyte	Approximate Retention Time (min)
benzene ^a	3.52
toluene ^a	6.13
ethylbenzene ^a	10.65
<u>o</u> -xylene ^a	12.92
<u>m</u> -xylene ^a	11.33
<u>p</u> -xylene ^a	11.04
cumene ^b	18.61
<u>p</u> -tert-butyltoluene ^b	21.45
α-methylstyrene ^b	19.99
β-methylstyrene ^b	20.82
styrene ^b	18.33

^a Separation achieved using a 30-m Stabilwax fused silica capillary colum.

12. Measure peak areas.

CALCULATIONS:

13. Determine the mass, μg (corrected for DE) of analyte found in the sample front (W_f) and back (W_b) sorbent sections, and in the average media blank front (B_f) and back (B_b) sorbent sections. NOTE: If W_b > W_f/10, report breakthrough and possible sample loss.

14. Calculate concentration, C, of analyte in the air volume sampled, V (L):

$$C = \frac{(W_f + W_b - B_f - B_b)}{V}, mg / m^3$$

NOTE: $\mu g/L = mg/m^3$

^b Separation achieved using a 30-m Rtx-35 fused silica capillary column.

EVALUATION OF METHOD:

The desorption efficiency, at levels ranging from 5 times the LOQ to 0.1x the REL, was determined for each analyte by spiking known amounts (in CS_2) on coconut shell charcoal tubes. Both groups of analytes (A and B) were spiked together on the charcoal sorbent tubes. All analytes, with the exception of styrene and naphthalene, exhibited acceptable desorption efficiency recovery results at all five levels evaluated. Styrene failed to meet the 75% recovery criteria at the 18.1 μ g and 90.6 μ g levels. Naphthalene failed to meet the 75% criteria at all levels evaluated ranging from 48.8 μ g to 976.0 μ g.

Each analyte, at a level approximately 0.05x REL/PEL, was evaluated for its storage stability @ 5°C after 7, 14, and 30 days. All analytes, with the exception of naphthalene, had acceptable recoveries after 30 days storage.

REFERENCES:

- [1] NIOSH [1984]. Hydrocarbons, Aromatic: Method 1501. In: Eller PM, ed. NIOSH Manual of Analytical Methods. 4th rev. ed. Cincinnati, OH: U.S. Department of Health and Human Services, Public Health Service, Centers for Disease Control, National Institute for Occupational Safety and Health, DHHS (NIOSH) Publication No. 94-113.
- [2] NIOSH [1977]. NIOSH Manual of Analytical Methods, 2nd. ed., V. 1, P&CAM 127, U.S. Department of Health, Education, and Welfare, Publ. (NIOSH) 77-157-A.
- [3] Ibid, V. 2, S22, S23, S25, S26, S29, S30, U.S. Department of Health, Education, and Welfare, Publ. (NIOSH) 77-157-B (1977).
- [4] Ibid, V. 3, S292, S311, S318, S343, U.S. Department of Health, Education, and Welfare, Publ. (NIOSH) 77-157-C (1977).
- [5] NIOSH [1977]. Documentation of the NIOSH Validation Tests, S22, S23, S25, S26, S29, S30, S292, S311, S318, S343, U.S. Department of Health, Education, and Welfare; Publ. (NIOSH) 77-185.

METHOD WRITTEN BY:

Stephanie M. Pendergrass, NIOSH/DART

TABLE 1. SYNONYMS, FORMULA, MOLECULAR WEIGHT, PROPERTIES

Name/Synonyms	Empirical Formula	Molecular Weight	Boiling Point (°C)	Vapor Pressure @ 25 °C (mm Hg)	(kPa)	Density @ 20 °C (g/mL)
benzene						_
CAS #71-43-2						
RTECS CY1400000	C_6H_6	78.11	80.1	95.2	12.7	0.879
p-tert-butyltoluene						
CAS #98-51-1						
RTECS XS8400000						
1-tert-butyl-4-methylbenzene	$C_{11}H_{16}$	148.25	192.8	0.7	0.09	0.861
cumene						
CAS #98-82-8						
RTECS GR8575000						
isopropylbenzene	C_9H_{12}	120.20	152.4	4.7	0.63	0.862
ethylbenzene						
CAS #100-41-4						
RTECS DA0700000	C_8H_{10}	106.17	136.2	9.6	1.28	0.867
α-methylstyrene						
CAS #98-83-9						
RTECS WL5075300						
isopropenylbenzene	.					
(1-methylethenyl)-benzene	C_9H_{10}	118.18	165.4	2.5	0.33	0.909
β-methylstyrene						
CAS #873-66-5						
RTECS DA8400500	C ₉ H ₁₀	118.18	175.0	_		0.911
	91110	110.10	170.0			0.011
toluene						
CAS #108-88-3						
RTECS XS5250000	C 11	92.14	110.6	20.4	3.79	0.067
methylbenzene	C ₇ H ₈	92.14	110.6	28.4	3.79	0.867
xylene ^c	C ₈ H ₁₀	106.17				
CAS #1330-20-7	(<u>ortho</u>)		144.4	6.7	0.89	0.880
RTECS ZE2100000	(<u>meta</u>)		139.1	8.4	1.12	0.864
dimethylbenzene (p-xylene)	(<u>para</u>)		138.4	8.8	1.18	0.861
styrene						
CAS #100-42-5						
RTECS WL3675000						
vinylbenzene	C ₈ H ₈	104.15	145.2	6.1	0.81	0.906

TABLE 2. PERMISSIBLE EXPOSURE LIMITS, PPM

		NIOSH		AC	GIH		
Substance	OSHA TWA	TWA	С	STEL	TLV	STEL	mg/m³ per ppm
benzene	1	0.1 ^a	1		10 ^b		3.19
p-tert-butyltoluene	10	10		20	1		6.06
cumene	50 (skin)	50 (skin)			50 (skin)		4.91
ethylbenzene	100	100		125	100	125	4.34
α-methylstyrene	100	50		100	50	100	4.83
β-methylstyrene	100	50		100	50	100	4.83
toluene	200	100		150	50 (skin)		3.77
<u>o</u> -xylene	100	100°		150	100	150	4.34
<u>m</u> -xylene	100	100			100	150	4.34
<u>p</u> -xylene	100	100			100	150	4.34
styrene	100	50		100	50	100 (skin)	4.26

^a Potential carcinogen

TABLE 3. SAMPLING FLOWRATE^a, VOLUME, CAPACITY, RANGE, OVERALL BIAS AND PRECISION

	s	ampling			kthrough me @	Range at	0,	verall	
Substance	Flowrate (L/min)	<u>Volu</u> MIN	me ^b (L) MAX	Conce	entration (mg/m³)	VOL-MIN (mg/m^3)	Bias (%)	Precision (Ŝ,,)	Accuracy (±%)
benzene	≤0.20	5	30	>45	149	42 - 165	-0.4	0.059	11.4
<u>p-tert</u> -butyltoluene	≤0.20	1	29	44	112	29 - 119	-10.3	0.071 ^c	20.7
cumene	≤0.20	1	30	>45	480	120 - 480	5.6	0.059	15.2
ethylbenzene	≤0.20	1	24	35	917	222 - 884	-7.6	0.089 ^c	17.1
α-methylstyrene	≤0.20	1	30	>45	940	236 - 943	-7.6	0.061 ^c	16.9
β-methylstyrene	≤0.20	1	30	>45	940	236 - 943	-7.6	0.061	16.9
toluene	≤0.20	1	8	12	2294	548 - 2190	1.6	0.052	10.9
xylene (o-,m-,p-)	≤0.20	2	23	35	870	218 - 870	-1.2	0.060	12.2
styrene	<1.00	1	14	21	1710	426 - 1710	-7.9	0.058 ^c	16.7

^b Suspect carcinogen

^c Group I Pesticide

 $^{^{\}rm a}$ Minimum recommended flow is 0.01 L/min. $^{\rm b}$ V $_{\rm Min}$ = minimum sample volume @ OSHA TWA; V $_{\rm Max}$ = maximum sample volume @ OSHA TWA $^{\rm c}$ Corrected value, calculated from data in Reference 5.

TABLE 4. MEASUREMENT RANGE AND PRECISION^a

	_	Measur	rement
Substance	LOD (µg/sample)	Range (mg)	$\begin{array}{c} \textbf{Precision} \\ (\hat{S}_r) \end{array}$
benzene	0.5	0.004-0.35	0.013
p-tert-butyltoluene	1.1	0.013-1.09	0.017 ^a
cumene	0.6	0.039-3.46	0.017
ethylbenzene	0.5	0.045-8.67	0.015
α-methylstyrene	0.6	0.036-3.57	0.014
β-methylstyrene	0.6	0.036-0.728	0.014
toluene	0.7	0.024-4.51	0.022
o-xylene	0.8	0.044-10.4	0.014
m-xylene	0.8	0.043-0.864	0.013
p-xylene	0.7	0.043-0.861	0.015
styrene	0.4	0.181-8.49	0.014

^a Corrected value, calculated from data in [5].

POLYCHLOROBIPHENYLS

mixture: $C_{12}H_{10-x}CI_x$ MW: ca. 258 (42% CI; $C_{12}H_7CI_3$); CAS: Table 1 RTECS: Table 1

[where x = 1 to 10] ca. 326 (54% CI; $C_{12}H_5Cl_5$)

0.5 mg/m³ (54% CI)

METHOD: 5503, Issue 2 EVALUATION: PARTIAL Issue 1: 15 February 1984

Revision #1: 15 August 1987 Issue 2: 15 August 1994

OSHA: 1 mg/m³ (42% CI); PROPERTIES: 42% CI: BP 325 to 366 °C; MP -19 °C;

d 1.38 g/mL @ 25 °C;

NIOSH: 0.001 mg/m 3 /10 h (carcinogen) VP 0.01 Pa (8 x 10 5 mm Hg;

ACGIH: 1 mg/m³ (42% CI) (skin) 1 mg/m³) @ 20 °C

0.5 mg/m³ (54% CI) (skin) 54% CI: BP 365 to 390 °C; MP 10 °C; d 1.54 g/mL @ 25 °C; VP

0.0004 Pa (3 x 10⁻⁶ mm Hg; 0.05 mg/m³) @ 20 °C

SYNONYMS: PCB; 1,1'-biphenyl chloro; chlorodiphenyl, 42% CI (Aroclor 1242); and 54% CI (Aroclor 1254)

SAMPLING MEASUREMENT SAMPLER: FILTER + SOLID SORBENT TECHNIQUE: GAS CHROMATOGRAPHY, ECD (63Ni) (13-mm glass fiber + Florisil, 100 mg/50 mg) ANALYTE: polychlorobiphenyls FLOW RATE: 0.05 to 0.2 L/min or less **DESORPTION:** filter + front section, 5 mL hexane; back section, 2 mL hexane VOI -MIN-1 L @ 0.5 mg/m³ -MAX: 50 L **INJECTION** VOLUME: 4-µL with 1-µL backflush SHIPMENT: transfer filters to glass vials after sampling TEMPERATURE-INJECTION: 250 to 300 °C SAMPLE -DETECTOR: 300 to 325 °C -COLUMN: 180 °C STABILITY: unknown for filters; 2 months for Florisil tubes [1] **CARRIER GAS:** N₂, 40 mL/min **BLANKS:** 2 to 10 field blanks per set COLUMN: glass, 1.8 m x 2-mm ID, 1.5% OV-17/1.95% QF-1 on 80/100 mesh Chromosorb WHP **ACCURACY** CALIBRATION: standard PCB mixture in hexane **RANGE STUDIED:** not studied RANGE: 0.4 to 4 µg per sample [2] BIAS: none identified OVERALL PRECISION (\$,T): not evaluated ESTIMATED LOD: 0.03 µg per sample [2] ACCURACY: not determined

APPLICABILITY: The working range is 0.01 to 10 mg/m³ for a 40-L air sample [1]. With modifications, surface wipe samples may be analyzed [3,4].

PRECISION (Š,): 0.044 [1]

INTERFERENCES: Chlorinated pesticides, such as DDT and DDE, may interfere with quantification of PCB. Sulfur-containing compounds in petroleum products also interfere [5].

OTHER METHODS: This method revises methods S120 [6] and P&CAM 244 [1]. Methods S121 [7] and P&CAM 253 [8] for PCB have not been revised.

REAGENTS:

- 1. Hexane, pesticide quality.
- Florisil, 30/48 mesh sieved from 30/60 mesh. After sieving, dry at 105 °C for 45 min. Mix the cooled Florisil with 3% (w/w) distilled water.
- 3. Nitrogen, purified.
- Stock standard solution of the PCB in methanol or isooctane (commercially available).*
 - * See SPECIAL PRECAUTIONS.

EQUIPMENT:

- 1. Sampler: 13-mm glass fiber filter without binders in a Swinnex cassette (Cat. No. SX 0001300, Millipore Corp.) followed by a glass tube, 7 cm long, 6-mm OD, 4-mm ID containing two sections of 30/48 mesh deactivated Florisil. The front section is preceded by glass wool and contains 100 mg and the backup section contains 50 mg; urethane foam between sections and behind the backup section. (SKC 226-39, Supelco ORBO-60, or equivalent) Join the cassette and Florisil tube with PVC tubing, 3/8" L x 9/32" OD x 5/32" ID, on the outlet of the cassette and with another piece of PVC tubing, 3/4" L x 5/16" OD x 3/16" ID, complete the union.
- Personal sampling pump, 0.05 to 0.2 L/min, with flexible connecting tubing.
- 3. Tweezers.
- 4. Vials, glass, 4- and 7-mL, with aluminum or PTFE-lined caps
- 5. Gas chromatograph, electron capture detection (⁶³Ni), integrator and column (page 5503-1).
- 6. Volumetric flasks, 10-mL and other convenient sizes for preparing standards.
- 7. Syringe, 10-µL.

SPECIAL PRECAUTIONS: Avoid prolonged or repeated contact of skin with PCB and prolonged or repeated breathing of the vapor [9-11].

SAMPLING:

- 1. Calibrate each personal sampling pump with a representative sampler in line.
- 2. Break the ends of the Florisil tube immediately before sampling. Connect Florisil tube to Swinnex cassette and attach sampler to personal sampling pump with flexible tubing.
- 3. Sample at an accurately known flow rate between 0.05 and 0.2 L/min for a total sample size of 1 to 50 L.
 - NOTE: At low PCB concentrations, the sampler was found to be efficient when operated at flow rates up to 1 L/min, for 24 hours [4]. Under these conditions, the limit of detection was 0.02 µg/m³.
- 4. Transfer the glass fiber filters to 7-mL vials. Cap the Florisil tubes with plastic (not rubber) caps and pack securely for shipment.

SAMPLE PREPARATION:

- 5. Place the glass wool and 100-mg Florisil bed in the same 7-mL vial in which the filter was stored. Add 5.0 mL hexane.
- In a 4-mL vial, place the 50-mg Florisil bed including the two urethane plugs. Add 2.0 mL hexane
- 7. Allow to stand 20 min with occasional agitation.

CALIBRATION AND QUALITY CONTROL:

- 8. Calibrate daily with at least six working standards over the range 10 to 500 ng/mL PCB.
 - a. Add known amounts of stock standard solution to hexane in 10-mL volumetric flasks and dilute to the mark.
 - b. Analyze together with samples and blanks (steps 11 and 12).
 - c. Prepare calibration graph (sum of areas of selected peaks vs. ng PCB per sample).
- 9. Determine desorption efficiency (DE) at least once for each lot of glass fiber filters and Florisil used for sampling in the calibration range (step 8). Prepare three tubes at each of five levels plus three media blanks.
 - a. Remove and discard back sorbent section of a media blank Florisil tube.
 - b. Inject known amounts of stock standard solution directly onto front sorbent section and onto a media blank filter with a microliter syringe.
 - c. Cap the tube. Allow to stand overnight.
 - d. Desorb (steps 5 through 7) and analyze together with working standards (steps 11 and 12).
 - e. Prepare a graph of DE vs. µg PCB recovered.
- 10. Analyze three quality control blind spikes and three analyst spikes to ensure that the calibration graph and DE graph are in control.

MEASUREMENT:

- 11. Set gas chromatograph according to manufacturer's recommendations and to conditions given on page 5503-1. Inject sample aliquot manually using solvent flush technique or with autosampler.
 - NOTE 1: Where individual identification of PCB is needed, a procedure using a capillary column may be used [12].
 - NOTE 2: If peak area is above the linear range of the working standards, dilute with hexane, reanalyze and apply the appropriate dilution factor in calculations.
- 12. Sum the areas for five or more selected peaks.

CALCULATIONS:

- 13. Determine the mass, μg (corrected for DE) of PCB found on the glass fiber filter (W) and in the Florisil front (W_f) and back (W_b) sorbent sections, and in the average media blank filter (B) and front (B_f) and back (B_b) sorbent sections.
 - NOTE: If $W_b > W_t/10$, report breakthrough and possible sample loss.
- 14. Calculate concentration, C, of PCB in the air volume sampled, V (L):

$$C = \frac{(W + W_f + W_b - B - B_f - B_b)}{V}, mg/m^3.$$

EVALUATION OF METHOD:

This method uses 13-mm glass fiber filters which have not been evaluated for collecting PCB. In Method S120, however, Aroclor 1242 was completely recovered from 37-mm glass fiber filters using 15 mL isooctane [8,13,14]. With 5 mL of hexane, Aroclor 1016 was also completely recovered from 100-mg Florisil beds after one-day storage [1]. Thus, with no adsorption effect likely on glass fiber filters for PCB, 5 mL hexane should be adequate to completely extract PCB from combined filters and front sorbent sections. Sample stability on glass fiber filters has not been investigated. Breakthrough volume was >48 L for the Florisil tube at 75% RH in an atmosphere containing 10 mg/m ³ Aroclor 1016 [1].

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METHOD REVISED BY:

James E. Arnold, NIOSH/DPSE; S120 originally validated under NIOSH Contract 210-76-0123.

Table 1. General Information.

Compound	CAS	RTECS
Polychlorinated Biphenyls	1336-36-3	TQ1350000
Chlorobiphenyl	27323-18-8	DV2063000
Aroclor 1016 (41% CI)	12674-11-2	TQ1351000
Aroclor 1242 (42% CI)	53469-21-9	TQ1356000
Aroclor 1254 (54% CI)	11097-69-1	TQ1360000

Table 2. Composition of some Aroclors [15].

Major Components	Aroclor 1016	Aroclor 1242	Aroclor 1254
Biphenyl	0.1%	<0.1%	<0.1%
Monochlorobiphenyls	1	1	<0.1
Dichlorobiphenyls	20	16	0.5
Trichlorobiphenyls	57	49	1
Tetrachlorobiphenyls	21	25	21
Pentachlorobiphenyls	1	8	48
Hexachlorobiphenyls	<0.1	1	23
Heptachlorobiphenyls	none detected	<0.1	6
Octachlorobiphenyls	none detected	none detected	none detected

tungsten*

spectral wavelength shift

ELEMENTS by ICP (Nitric/Perchloric Acid Ashing)

MW: Table 1 CAS: Table 2 RTECS: Table 2

METHOD: 7300, Issue 3 EVALUATION: PARTIAL Issue 1: 15 August 1990 Issue 3: 15 March 2003

OSHA: Table 2 PROPERTIES: Table 1

NIOSH: Table 2 ACGIH: Table 2

SAMPLE

STABILITY:

ELEMENTS: aluminum* calcium lanthanum nickel strontium

vanadium* antimony* chromium* lithium* potassium tellurium arsenic cobalt* magnesium phosphorus tin yittrium barium manganese* thallium copper selenium zinc beryllium* iron molybdenum* silver titanium zirconium*

cadmium lead*

stable

*Some compounds of these elements require special sample treatment.

SAMPLING MEASUREMENT

SAMPLER: FILTER TECHNIQUE: INDUCTIVELY COUPLED ARGON

(0.8-µm, cellulose ester membrane, or 5.0-µm, polyvinyl chloride membrane) PLASMA, ATOMIC EMISSION SPECTROSCOPY (ICP-AES)

FLOWRATE: 1 to 4 L/min ANALYTE: elements above

VOL-MIN: Table 1

-MAX: Table 1 REAGENTS: conc. HNO₃/ conc. HClO₄ (4:1), 5 mL; 2mL increments added as needed

SHIPMENT: routine

CONDITIONS: room temperature, 30 min; 150 °C to near

FINAL

dryness

SOLUTION: 4% HNO₃, 1% HClO₄, 25 mL

LANKS: 2 to 10 field blanks per set

WAVELENGTH: depends upon element; Table 3

ACCURACY BACKGROUND CORRECTION:

RANGE STUDIED: not determined CALIBRATION: elements in 4% HNO₃, 1% HClO₄

BIAS: not determined RANGE: varies with element [1]

OVERALL PRECISION (Ŝ, T): not determined ESTIMATED LOD: Tables 3 and 4

ACCURACY: not determined PRECISION (S): Tables 3 and 4

APPLICABILITY: The working range of this method is 0.005 to 2.0 mg/m³ for each element in a 500-L air sample. This is simultaneous elemental analysis, not compound specific. Verify that the types of compounds in the samples are soluble with the ashing procedure selected.

INTERFERENCES: Spectral interferences are the primary interferences encountered in ICP-AES analysis. These are minimized by judicious wavelength selection, interelement correction factors and background correction [1-4].

OTHER METHODS: This issue updates issues 1 and 2 of Method 7300, which replaced P&CAM 351 [3] for trace elements. Flame atomic absorption spectroscopy (e.g., Methods 70XX) is an alternate analytical technique for many of these elements. Graphite fumace AAS (e.g., 7102 for Be, 7105 for Pb) is more sensitive.

REAGENTS:

- 1. Nitric acid (HNO₃), conc., ultra pure.
- 2. Perchloric acid (HClO₄), conc., ultra pure.*
- Ashing acid: 4:1 (v/v) HNO₃:HCIO₄. Mix 4 volumes conc. HNO₃ with 1 volume conc. HCIO₄.
- Calibration stock solutions, 1000 μg/mL.
 Commercially available, or prepared per instrument manufacturer's recommendation (see step 12).
- Dilution acid, 4% HNO₃, 1% HCIO₄. Add 50 mL ashing acid to 600 mL water; dilute to 1 L.
- 6. Argon.
- 7. Distilled, deionized water.
 - * See SPECIAL PRECAUTIONS.

EQUIPMENT:

- Sampler: cellulose ester membrane filter, 0.8-µm pore size; or polyvinyl chloride membrane, 5.0-µm pore size; 37-mm diameter, in cassette filter holder.
- 2. Personal sampling pump, 1 to 4 L/min, with flexible connecting tubing.
- Inductively coupled plasma-atomic emission spectrometer, equipped as specified by the manufacturer for analysis of elements of interest.
- 4. Regulator, two-stage, for argon.
- 5. Beakers, Phillips, 125-mL, or Griffin, 50-mL, with watchglass covers.**
- 6. Volumetric flasks, 10-, 25-,100-mL., and 1-L**
- 7. Assorted volumetric pipets as needed.**
- 8. Hotplate, surface temperature 150 °C.
 - ** Clean all glassware with conc. nitric acid and rinse thoroughly in distilled water before use.

SPECIAL PRECAUTIONS: All perchloric acid digestions are required to be done in a perchloric acid hood. When working with concentrated acids, wear protective clothing and gloves.

SAMPLING:

- 1. Calibrate each personal sampling pump with a representative sampler in line.
- 2. Sample at an accurately known flow rate between 1 and 4 L/min for a total sample size of 200 to 2000 L (see Table 1) for TWA measurements. Do not exceed a filter loading of approximately 2 mg total dust.

SAMPLE PREPARATION:

- 3. Open the cassette filter holders and transfer the samples and blanks to clean beakers.
- 4. Add 5 mL ashing acid. Cover with a watchglass. Let stand 30 min at room temperature. NOTE: Start a reagent blank at this step.
- 5. Heat on hotplate (120 °C) until ca. 0.5 mL remains.
 - NOTE 1: Recovery of lead from some paint matrices may require other digestion techniques. See Method 7082 (Lead by Flame AAS) for an alternative hotplate digestion procedure or Method 7302 for a microwave digestion procedure.
 - NOTE 2: Some species of Al, Be, Co, Cr, Li, Mn, Mo, V, and Zr will not be completely solubilized by this procedure. Alternative solubilization techniques for most of these elements can be found elsewhere [5-10]. For example, aqua regia may be needed for Mn [6,12].
- 6. Add 2 mL ashing acid and repeat step 5. Repeat this step until the solution is clear.
- 7. Remove watchglass and rinse into the beaker with distilled water.
- 8. Increase the temperature to 150 °C and take the sample to near dryness (ca. 0.5 mL).
- 9. Dissolve the residue in 2 to 3 mL dilution acid.
- 10. Transfer the solutions quantitatively to 25-mL volumetric flasks.
- 11. Dilute to volume with dilution acid.
 - NOTE: If more sensitivity is required, the final sample volume may be held to 10 mL.

CALIBRATION AND QUALITY CONTROL:

12. Calibrate the spectrometer according to the manufacturers recommendations.

NOTE: Typically, an acid blank and 1.0 µg/mL multielement working standards are used. The following multielement combinations are chemically compatible in 4% HNO₃/1% HCIO₄:

- a. Al, As, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, La, In, Na
- b. Ag, K, Li, Mg, Mn, Ni, P, Pb, Se, Sr, Tl, V, Y, Zn, Sc
- c. Mo, Sb, Sn, Te, Ti, W, Zr
- d. Acid blank
- 13. Analyze a standard for every ten samples.
- 14. Check recoveries with at least two spiked blank filters per ten samples.

MEASUREMENT:

- 15. Set spectrometer to conditions specified by manufacturer.
- 16. Analyze standards and samples.

NOTE: If the values for the samples are above the range of the standards, dilute the solutions with dilution acid, reanalyze and apply the appropriate dilution factor in the calculations.

CALCULATIONS:

- 17. Obtain the solution concentrations for the sample, C_s (µg/mL), and the average media blank, C_b (µg/mL), from the instrument.
- 18. Using the solution volumes of sample, V_s (mL), and media blank, V_b (mL), calculate the concentration, C (mg/m³), of each element in the air volume sampled, V (L):

$$C = \frac{CsVs - CbVb}{V}, mg / m^3$$

NOTE: $\mu g/L = mg/m^3$

EVALUATION OF METHOD:

Issues 1 and 2

Method, 7300 was originally evaluated in 1981 [2,3]. The precision and recovery data were determined at 2.5 and 1000 μg of each element per sample on spiked filters. The measurements used for the method evaluation in Issues 1 and 2 were determined with a Jarrell-Ash Model 1160 Inductively Coupled Plasma Spectrometer operated according to manufacturer's instructions.

Issue 3

In this update of NIOSH Method 7300, the precision and recovery data were determined at approximately 3x and 10x the instrumental detection limits on commercially prepared spiked filters [12] using 25.0 mL as the final sample volume. Tables 3 and 4 list the precision and recovery data, instrumental detection limits, and analytical wavelengths for mixed cellulose ester (MCE) and polyvinyl chloride (PVC) filters. PVC Filters which can be used for total dust measurements and then digested for metals measurements were tested and found to give good results. The values in Tables 3 and 4 were determined with a Spectro Analytical Instruments Model End On Plasma (EOP)(axial) operated according to manufacturer's instructions.

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METHOD REVISED BY:

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Method originally written by Mark Millson, NIOSH/DART, and R. DeLon Hull, Ph.D., NIOSH/DSHEFS, James B. Perkins, David L. Wheeler, and Keith Nicholson, DataChem Labortories, Salt Lake City, UT.

TABLE 1. PROPERTIES AND SAMPLING VOLUMES

	Properties			
Element	Atomic	<u> </u>	<u> Air Volume</u>	e, L @ OSHA PEL
(Symbol)	Weight	MP, °C	MIN	MAX
Silver (Ag)	107.87	961	250	2000
Aluminum (AI)	26.98	660	5	100
Arsenic (As)	74.92	817	5	2000
Barium (Ba)	137.34	710	50	2000
Beryllium (Be)	9.01	1278	1250	2000
Calcium (Ca)	40.08	842	5	200
Cadmium (Cd)	112.40	321	13	2000
Cobalt (Co)	58.93	1495	25	2000
Chromium (Cr)	52.00	1890	5	1000
Copper (Cu)	63.54	1083	5	1000
Iron (Fe)	55.85	1535	5	100
Potassium (K)	39.10	63.65	5	1000
Lanthanum	138.91	920	5	1000
Lithium (Li)	6.94	179	100	2000
Magnesium (Mg)	24.31	651	5	67
Manganese (Mn)	54.94	1244	5	200
Molybdenum (Mo)	95.94	651	5	67
Nickel (Ni)	58.71	1453	5	1000
Phosphorus (P)	30.97	44	25	2000
Lead (Pb)	207.19	328	50	2000
Antimony (Sb)	121.75	630.5	50	2000
Selenium (Se)	78.96	217	13	2000
Tin (Sn)	118.69	231.9	5	1000
Strontium (Sr)	87.62	769	10	1000
Tellurium (Te)	127.60	450	25	2000
Titanium (Ti)	47.90	1675	5	100
Thallium (TI)	204.37	304	25	2000
Vanadium (V)	50.94	1890	5	2000
Tungsten (W)	183.85	3410	5	1000
Yttrium (Y)	88.91	1495	5	1000
Zinc (Zn)	65.37	419	5	200
Zirconium (Zr)	91.22	1852	5	200

TABLE 2. EXPOSURE LIMITS, CAS #, RTECS

Element (Symbol)	CAS#	RTECS	Expos OSHA	ure Limits, mg/m³ (Ca = 0 NIOSH	carcinogen) ACGIH
Silver (Ag)	7440-22-4	VW3500000	0.01 (dust, fume, metal)	0.01 (metal, soluble)	0.1 (metal) 0.01 (soluble)
Aluminum (Al)	7429-90-5	BD0330000	15 (total dust) 5 (respirable)	10 (total dust) 5 (respirable fume) 2 (salts, alkyls)	10 (dust) 5 (powders, fume) 2 (salts, alkyls)
Arsenic (As)	7440-38-2	CG0525000	varies	C 0.002, Ca	0.01, Ca
Barium (Ba)	7440-39-3	CQ8370000	0.5	0.5	0.5
Beryllium (Be)	7440-41-7	DS1750000	0.002, C 0.005	0.0005, Ca	0.002, Ca
Calcium (Ca)	7440-70-2		varies	varies	varies
Cadmium (Cd)	7440-43-9	EU9800000	0.005	lowest feasible, Ca	0.01 (total), Ca 0.002 (respir.), Ca
Cobalt (Co)	7440-48-4	GF8750000	0.1	0.05 (dust, fume)	0.02 (dust, fume)
Chromium (Cr)	7440-47-3	GB4200000	0.5	0.5	0.5
Copper (Cu)	7440-50-8	GL5325000	1 (dust, mists) 0.1 (fume)	1 (dust) 0.1 (fume)	1 (dust, mists) 0.2 (fume)
Iron (Fe)	7439-89-6	NO4565500	10 (dust, fume)	5 (dust, fume)	5 (fume)
Potassium (K)	7440-09-7	TS6460000			
Lanthanum	7439-91-0		_	_	
Lithium (Li)	7439-93-2				
Magnesium (Mg)	7439-95-4	OM2100000	15 (dust) as oxide 5 (respirable)	10 (fume) as oxide	10 (fume) as oxide
Manganese (Mn)	7439-96-5	OO9275000	C 5	1; STEL 3	5 (dust) 1; STEL 3 (fume)
Molybdenum (Mo)	7439-98-7	QA4680000	5 (soluble) 15 (total insoluble)	5 (soluble) 10 (insoluble)	5 (soluble) 10 (insoluble)
Nickel (Ni)	7440-02-0	QR5950000	1	0.015, Ca	0.1 (soluble) 1 (insoluble, metal)
Phosphorus (P)	7723-14-0	TH3500000	0.1	0.1	0.1
Lead (Pb)	7439-92-1	OF7525000	0.05	0.05	0.05
Antimony (Sb)	7440-36-0	CC4025000	0.5	0.5	0.5
Selenium (Se)	7782-49-2	VS7700000	0.2	0.2	0.2
Tin (Sn)	7440-31-5	XP7320000	2	2	2
Strontium (Sr)	7440-24-6	_	-	_	
Tellurium (Te)	13494-80-9	WY2625000	0.1	0.1	0.1
Titanium (Ti)	7440-32-6	XR1700000			
Thallium (TI)	7440-28-0	XG3425000	0.1 (skin) (soluble)	0.1 (skin) (soluble)	0.1 (skin)
Vanadium (V)	7440-62-2	YW240000		C 0.05	
Tungsten	7440-33-7	-	5	5 10 (STEL)	5 10 (STEL)
Yttrium (Y)	7440-65-5	ZG2980000	1	N/A	1
Zinc (Zn)	7440-66-6	ZG8600000	-		
Zirconium (Zr)	7440-67-7	ZH7070000	5	5, STEL 10	5, STEL 10

TABLE 3. MEASUREMENT PROCEDURES AND DATA [1]. Mixed Cellulose Ester Filters (0.45 μm)

	wavelength	Est. LOD	LOD	Certified	% Recovery		Certified	%	Percent
Element	nm	μg/	ng/m L	3x LOD	(c)	RSD	10x LOD	Recovery	RSD
(a)		Filter		(b)		(N=25)	(b)	(c)	(N=25)
Ag	328	0.042	1.7	0.77	102.9	2.64	3.21	98.3	1.53
ΑI	167	0.115	4.6	1.54	105.4	11.5	6.40	101.5	1.98
As	189	0.140	5.6	3.08	94.9	2.28	12.9	93.9	1.30
Ва	455	0.005	0.2	0.31	101.8	1.72	1.29	97.7	0.69
Ве	313	0.005	0.2	0.31	100.0	1.44	1.29	98.4	0.75
Ca	317	0.908	36.3	15.4	98.7	6.65	64.0	100.2	1.30
Cd	226	0.0075	0.3	0.31	99.8	1.99	1.29	97.5	0.88
Co	228	0.012	0.5	0.31	100.8	1.97	1.29	98.4	0.90
Cr	267	0.020	0.8	0.31	93.4	16.3	1.29	101.2	2.79
Cu	324	0.068	2.7	1.54	102.8	1.47	6.40	100.6	0.92
Fe	259	0.095	3.8	1.54	103.3	5.46	6.40	98.0	0.95
K	766	1.73	69.3	23.0	90.8	1.51	96.4	97.6	0.80
La	408	0.048	1.9	0.77	102.8	2.23	3.21	100.1	0.92
Li	670	0.010	0.4	0.31	110.0	1.91	1.29	97.7	0.81
Mg	279	0.098	3.9	1.54	101.1	8.35	6.40	98.0	1.53
Mn	257	0.005	0.2	0.31	101.0	1.77	1.29	94.7	0.73
Мо	202	0.020	0.8	0.31	105.3	2.47	1.29	98.6	1.09
Ni	231	0.020	0.8	0.31	109.6	3.54	1.29	101.2	1.38
Р	178	0.092	3.7	1.54	84.4	6.19	6.40	82.5	4.75
Pb	168	0.062	2.5	1.54	109.4	2.41	6.40	101.7	0.88
Sb	206	0.192	7.7	3.08	90.2	11.4	12.9	41.3	32.58
Se	196	0.135	5.4	2.3	87.6	11.6	9.64	84.9	4.78
Sn	189	0.040	1.6	0.77	90.2	18.0	3.21	49	21.79
Sr	407	0.005	0.2	0.31	101.0	1.55	1.29	97.3	0.65
Te	214	0.078	3.1	1.54	102.0	2.67	6.40	97.4	1.24
Ti	334	0.050	2.0	0.77	98.4	2.04	3.21	93.4	1.08
ΤI	190	0.092	3.7	1.54	100.9	2.48	6.40	99.1	0.80
V	292	0.028	1.1	0.77	103.2	1.92	3.21	98.3	0.84
W	207	0.075	3.0	1.54	72.2	10.1	6.40	57.6	14.72
Υ	371	0.012	0.5	0.31	100.5	1.80	1.29	97.4	0.75
Zn	213	0.310	12.4	4.60	102.2	1.87	19.3	95.3	0.90
Zr	339	0.022	0.9	0.31	88.0	19.4	1.29	25	57.87

⁽a) Bold values are qualitative only because of low recovery.

⁽b) Values are certified by Inorganic Ventures INC. at 3x and 10x the approximate instrumental LOD

⁽c) Values reported were obtained with a Spectro Analytical Instruments EOP ICP; performance may vary with instrument and should be independently verified.

TABLE 4. MEASUREMENT PROCEDURES AND DATA [1]. Polyvinyl Chloride Filter (5.0 μ m)

Element	wavelength nm	Est. LOD µg per	LOD ng/mL	Certified 3x LOD	% Recovery	Percent RSD	Certified ¹⁷ 10x LOD	% Recovery	Percent RSD
(c)		filter		(b)	(a)	(N=25)	(b)	(a)	(N=25)
Ag	328	0.042	1.7	0.78	104.2	8.20	3.18		18.9
ΑI	167	0.115	4.6	1.56	77.4	115.24	6.40		20.9
As	189	0.140	5.6	3.10	100.7	5.13	12.70		3.2
Ва	455	0.005	0.2	0.31	102.4	3.89	1.270		2.0
Ве	313	0.005	0.2	0.31	106.8	3.53	1.270		2.1
Ca	317	0.908	36.3	15.6	68.1	12.66	64.00		5.3
Cd	226	0.0075	0.3	0.31	105.2	5.57	1.27	101.9	2.8
Co	228	0.012	0.5	0.31	109.3	4.67	1.27	102.8	2.8
Cr	267	0.020	0.8	0.31	109.4	5.31	1.27	103.4	4.1
Cu	324	0.068	2.7	1.56	104.9	5.18	6.40	101.8	2.4
Fe	259	0.095	3.8	1.56	88.7	46.82	6.40	99.1	9.7
K	766	1.73	69.3	23.4	96.4	4.70	95.00	99.2	2.2
La	408	0.048	1.9	0.78	45.5	4.19	3.18	98.8	2.6
Li	670	0.010	0.4	0.31	107.7	4.80	1.27	110.4	2.7
Мg	279	0.098	3.9	1.56	54.8	20.59	6.40	64.5	5.7
Mn	257	0.005	0.2	0.31	101.9	4.18	1.27	99.3	2.4
Мо	202	0.020	0.8	0.31	106.6	5.82	1.27	98.1	3.8
Ni	231	0.020	0.8	0.31	111.0	5.89	1.27	103.6	3.2
Р	178	0.092	3.7	1.56	101.9	17.82	6.40	86.5	10.4
Pb	168	0.062	2.5	1.56	109.6	6.12	6.40	103.2	2.9
Sb	206	0.192	7.7	3.10	64.6	22.54	12.70	38.1	30.5
Se	196	0.135	5.4	2.30	83.1	26.23	9.50	76.0	17.2
Sn	189	0.040	1.6	0.78	85.7	27.29	3.18	52.0	29.4
Sr	407	0.005	0.2	0.31	71.8	4.09	1.27	81.2	2.7
Te	214	0.078	3.1	1.56	109.6	7.49	6.40	97.3	3.8
Ti	334	0.050	2.0	0.78	101.0	9.46	3.18	92.4	5.5
TI	190	0.092	3.7	1.56	110.3	4.04	6.40	101.9	2.0
V	292	0.028	1.1	0.78	108.3	3.94	3.18	102.5	2.6
W	207	0.075	3.0	1.56	74.9	15.79	6.40	44.7	19.6
Υ	371	0.012	0.5	0.31	101.5	3.63	1.27	101.4	2.5
Zn	213	0.310	12.4	4.70	91.0	68.69	19.1	101.0	9.6
Zr	339	0.022	0.9	0.31	70.7	54.20	1.27		42.1

⁽a) Values reported were obtained with a Spectro Analytical Instruments EOP ICP; performance may vary with instrument and should be independently verified.

⁽b) Values are certified by Inorganic Ventures INC. at 3x and 10x the approximate instrumental LOD [12].

⁽c) Bold values are qualitative only because of low recovery. Other digestion techniques may be more appropriate for these elements and their compounds.

From: Goloubow, Ron

Sent: Wednesday, November 18, 2009 7:21 PM **To:** Santos.Carmen@epamail.epa.gov

Cc: Gibbs, Alan

Subject: FW: 1009 66th Avenue Oakland, CA - Confirmation soil samples for Non-PCB excavations

Attachments: PCBs in soil rev2 Layout1 (1).pdf

Carmen -

Per my voice message, we understand that confirmation soil samples that are to be collected from the three areas of excavation that are located OUTSIDE the excavation areas for PCB-affected soil will not be collected for the analysis of PCBs (see attached Figure 2). These areas are being excavated for soil affected by TPH, metals, or SVOCs and not PCBs. This sampling scheme is appropriate based on the analytical results of PCB analysis for soil sample collected from within (and near) the "footprint" of the proposed areas of excavation (see Figure 2).

Thanks Ron.

Ron Goloubow, P.G.
Senior Associate Geologist
LFR Inc., an ARCADIS Company
1900 Powell Street, 12th Floor
Emeryville, CA 94608-1827
510-596-9550 Direct Dial
510-501-1789 Cell
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From: Goloubow, Ron

Sent: Thursday, January 14, 2010 1:56 PM
To: Santos.Carmen@epamail.epa.gov

Cc: Gibbs, Alan; Goldberg Day, Amy; charles@pacificcharter.org;

Mike.Barr@aspirepublicschools.org; Annie.Bauer@aspirepublicschools.org;

Wilson.Patrick@epamail.epa.gov; paresh.khatri@acgov.org; MMalinow@dtsc.ca.gov

Subject: Aspire - Oakland, CA - Follow Up to December 10 and 16, 2009 Conference Calls - Cleanup

Level and Risk-Based Disposal Approval Application

Attachments: ltr-Aspire-RBCP-Jan10-RV009155.pdf

Carmen and others - attached is the request to change the remedial approach from a Self-Implementing Cleanup Plan (SICP) to a Risk-Based Cleanup Plan (RBCP). Carmen, I will contact you early next week to determine the EPA's schedule regarding the review of the attached letter. Thanks in advance for your prompt attention to this matter and as always please feel free to contact me should you have any questions or concerns regarding this project.

Ron.

Ron Goloubow, PG | Senior Associate Geologist | ron.goloubow@arcadis-us.com

ARCADIS U.S., Inc. | 1900 Powell Street, Suite 1200 | Emeryville, CA 94608 T. 510.596.9550 | M. 510.501-1789 | F. 510.652.2246 www.arcadis-us.com

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Friday, December 18, 2009 11:31 AM

To: Goloubow, Ron

Cc: Gibbs, Alan; Goldberg Day, Amy; charles@pacificcharter.org; Mike.Barr@aspirepublicschools.org; Annie.Bauer@aspirepublicschools.org; Wilson.Patrick@epamail.epa.gov; paresh.khatri@acgov.org;

MMalinow@dtsc.ca.gov

Subject: PCBs - Aspire Site: Follow Up to December 10 and 16, 2009 Conference Calls - Cleanup Level and Risk-Based

Disposal Approval Application

Importance: High

Dear Ron Goloubow:

We had a conference call with you on December 16, 2009 to answer questions that LFR had on USEPA's reply to LFR's December 11, 2009 message (which is included at the end of the attached message string). During that conference call, USEPA clarified that under the self-implementing PCB cleanup option individual cleanup verification samples must meet for PCBs the cleanup level of 0.13 ppm. Under the self-implementing cleanup option, cleanup levels for PCBs are met based on comparison of in-situ soil verification sampling data to the cleanup level and not on statistical analysis of the data. LFR / Aspire may consider applying for a risk-based disposal approval for the PCB cleanup at the Aspire site in Oakland. If this option is elected, LFR / Aspire need to submit a letter to USEPA explaining why LFR / Aspire want now to conduct the PCB cleanup under the risk-based cleanup option (40 CFR 761.61(c)) instead of under the PCB self-implementing cleanup plan (40 CFR 761.61(a)) that USEPA conditionally approved on November 13, 2009. We explained that in accordance with 40 CFR 761.61(c), LFR / Aspire must obtain USEPA's approval of such risk-based disposal application before beginning the PCB cleanup. Further, given a school has been proposed to be built at the Aspire site in Oakland and that ACDEH has approved a cleanup plan with a cumulative risk-based cleanup level of 0.13 ppm, EPA has requested that LFR / Aspire's PCB risk-based cleanup application be consistent with the EPA TSCA PCB regulatory requirements, DTSC School Program requirements, and ACDEH requirements.

As explained during the conference call, under the risk-based PCB cleanup option, the party conducting the cleanup can propose cleanup verification sampling and data handling procedures different than those

required in the PCB self-implementing option to demonstrate compliance with the cleanup level (see 40 CFR 761.61(c)). The LFR risk-based cleanup plan must include all the information already submitted by LFR in its self-implementing PCB cleanup notification (including the written, signed certification) and all risk-based calculations used to derive the 0.13 ppm cleanup level (see 40 CFR 761.61(c)). In addition to PCBs, the cleanup level should encompass all the other contaminants found at the site. In addition, the LFR / Aspire risk-based cleanup application must include all the information we requested in our December 14, 2009 electronic message sent to you at 10:38 AM. The application must include all the calculations that LFR / Aspire will apply in the evaluation of cleanup verification data to demonstrate the 0.13 ppm cleanup level has been met for PCBs and all other contaminants at the site.

USEPA will make its best efforts to expedite review and approval of the application. The completeness and quality of the application, however, will facilitate an expedited review provided we do not encounter any emergencies at other sites.

Please call me if you have any questions concerning this message.

I thank you for your courtesies and wish you a happy and safe Holiday Season.

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360

fax: 415.947.3533

----Forwarded by Carmen Santos/R9/USEPA/US on 12/18/2009 10:50AM ----

To: "Goloubow, Ron" < Ron. Goloubow@lfr.com>

From: Carmen Santos/R9/USEPA/US

Date: 12/14/2009 10:38AM

cc: "Gibbs, Alan" <Alan.Gibbs@lfr.com>, "Goldberg Day, Amy" <Amy.GoldbergDay@lfr.com>, Charles Robitaille <charles@pacificcharter.org>, Mike Barr <Mike.Barr@aspirepublicschools.org>, Annie Bauer

<Annie.Bauer@aspirepublicschools.org>, Patrick Wilson/R9/USEPA/US@EPA

Subject: Re: FW: PCBs - Aspire Site, Follow Up to December 10, 2009 Conference Call

Dear Ron Goloubow:

This message reiterates our request for the information that we asked in the December 11, 2009 message (sent to you at 12:02 PM). The use and application of the Agency's Pro-UCL statistical package to support data analysis is consistent with current Agency risk assessment guidance. The use of the Pro-UCL package however, does not mitigate Aspire's responsibility to provide the additional risk assessment supporting information that was contained in my previous message to you. That is, a comprehensive and site-wide conceptual site model (CSM), and the supporting risk assessment exposure and risk characterization equations - in addition to the equation inputs - will be necessary for EPA to complete a timely review.

In addition, samples with contaminant concentrations less than the laboratory detection or reporting limit(s) should be managed consistent with the guidelines found in the Pro-UCL support guidance. That is, the statistical package will conduct an evaluation of the entire data set to determine its statistical distribution. A distribution-specific upper confidence limit on the mean (UCLm) will then be reported and should then be used as the exposure point concentration (EPC) in support of risk characterization. Pro-UCL will use boot-strap and other statistical methods to approximate the most appropriate concentration value to be substituted for those samples with PCB concentrations less than the laboratory reporting or detection limit. Therefore, the substitution of non-detect sample results with the reporting limit is not the recommended approach.

We look forwa	ard to receiving the requested information.
Thank you for	your courtesies.
Sincerely,	
RCRA Correct	
	, Ron"12/11/2009 02:28:17 PMPer our conversation yesterday, LFR is in the process of 95% upper confidence level sta
From:	"Goloubow, Ron" <ron.goloubow@lfr.com></ron.goloubow@lfr.com>
To:	Carmen Santos/R9/USEPA/US@EPA, Patrick Wilson/R9/USEPA/US@EPA, "Khatri, Paresh, Env. Health" <paresh.khatri@acgov.org>, Mark Malinowski <mmalinow@dtsc.ca.gov></mmalinow@dtsc.ca.gov></paresh.khatri@acgov.org>
Ce:	"Gibbs, Alan" <alan.gibbs@lfr.com>, "Goldberg Day, Amy" <amy.goldbergday@lfr.com>, Charles Robitaille <charles@pacificcharter.org>, Mike Barr <mike.barr@aspirepublicschools.org>, Annie Bauer <annie.bauer@aspirepublicschools.org></annie.bauer@aspirepublicschools.org></mike.barr@aspirepublicschools.org></charles@pacificcharter.org></amy.goldbergday@lfr.com></alan.gibbs@lfr.com>

Per our conversation yesterday, LFR is in the process of applying the 95% upper confidence level statistical analysis (95-UCL) to the analytical data for the soil samples that contain PCBs greater than 0.13 mg/kg and less than 0.39 mg/kg that would remain in soil at the Site. For samples that have less than the laboratory reporting limit we are planning to use the laboratory reporting limit as a concentration of PCBs that are left in place at that particular location. The US EPA statistical software ProUCL will be used to calculate the 95% UCL.

FW: PCBs - Aspire Site, Follow Up to December 10, 2009 Conference Call

If this analysis determines that the 95-UCL is ≤0.13 mg/kg for soil across the Site would this analysis provide the data required to deem the removal action as successful?

Please let me know.

Date:

Subject:

Ron Goloubow, P.G. LFR Inc., an ARCADIS Company 510-596-9550 Direct Dial 510-501-1789 Cell 510-652-4906 Facsimile ron.goloubow@lfr.com

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Friday, December 11, 2009 12:02 PM

12/11/2009 02:28 PM

To: Goloubow, Ron; Gibbs, Alan

Cc: Annie Bauer; Mike Barr; Mark Malinowski; Khatri, Paresh, Env. Health; Charles Robitaille;

Wilson.Patrick@epamail.epa.gov

Subject: PCBs - Aspire Site, Follow Up to December 10, 2009 Conference Call

Dear Ron Goloubow and Alan Gibbs:

I am following up on the issue of Aspire continuing with the conditionally-approved PCB self-implementing cleanup notification rather than submitting a PCB risk-based disposal approval. Our November 13, 2009 conditional approval letter establishes a cleanup goal for PCBs of 0.13 mg/kg (total Aroclors) for the Aspire school site in Oakland - a level consistent with the cleanup goal proposed in your corrective action plan and a concentration previously approved by the Alameda County Department of Health (ACDH).

I want to clarify that if Aspire decides to propose a different cleanup level, that Aspire may make such proposal via an amendment to the current self-implementing cleanup notification as long as: (1) all exposure assessment and risk characterization calculations and inputs, a site-wide conceptual site model (CSM), and all supporting justifications are submitted to USEPA for review and approval, (2) the proposed PCB risk-based cleanup level does not increase the site-wide cumulative risk or hazard of applicable contaminants at the site beyond a risk range acceptable to ACDH, DTSC School Program, and USEPA, and (3) ACDH, DTSC's School Program, and USEPA agree that the proposed cleanup level is adequate and protective.

Please call me if you have any questions concerning this follow up message.

Thank you for your courtesies and have a nice day.

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360 fax: 415.947.3533

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From: Goloubow, Ron

Sent: Thursday, March 04, 2010 4:05 PM

To: 'Santos.Carmen@epamail.epa.gov'; Rollins.Christopher@epamail.epa.gov

Subject: Aspire Oakland, CA - Manifests

Attachments: aspire wm manifests_001.pdf; aspire wm manifests_029.pdf

Carmen the attached manifests are for the 968.81 tons of PCB-affected soil that was excavated, and transported from the subject Site to Waste Management's Kettleman Hills Landfill. I will send hard copies via regular mail.

Thanks Ron.

Ron Goloubow, PG | Senior Associate Geologist | ron.goloubow@arcadis-us.com

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From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Monday, February 22, 2010 12:27 PM

To: Goloubow, Ron

Cc: Rollins.Christopher@epamail.epa.gov

Subject: PCBs: Aspire Site in Oakland (1009 66th Avenue)

Greetings, Ron:

This message is concerning the application dated January 14, 2010.

I want to provide a clarification on the issue of disposal of PCB remediation waste, since we have cited the regulations for disposal in several previous occasions. This message also request specific information concerning off-site disposal of PCB remediation waste.

In reviewing the application, it seems that LFR-ARCADIS / Aspire believe that soils contaminated with PCBs at concentrations greater than 1 mg/kg and lower than 50 mg/kg are not regulated under TSCA. The Aspire application states that: "In addition, soil will be transported for off-site disposal as a non-TSCA waste (PCB concentrations greater than 1 mg/kg but less than 50 mg/kg)."

Contaminated soils are bulk PCB remediation wastes and regulated for disposal under TSCA regardless the TSCA cleanup is being conducted under the self- implementing (40 CFR 761.61(a)) or risk-based disposal approval (40 CFR 761.61(c)) sections of the TSCA regulations. See 40 CFR 761.61(a)(5)(i)(B), (B)(1), (B)(2)(ii) and 40 CFR 761.61(a)(5)(v)(a) concerning off-site disposal of bulk PCB remediation waste with a PCB concentration below 50 mg/kg.

Within 30 days after the date of this message please submit copies of the documents related to the transportation and offsite disposal of bulk PCB remediation wastes (containing PCBs at less than 50 mg/kg) demonstrating such waste was properly identified as TSCA regulated and disposed off-site in accordance with the regulations cited above. In addition, the in-situ soil PCB concentration should have been used to determine the PCB concentration for off-site disposal and not the PCB concentration of soils after excavation and staged in a pile.

If you have any questions concerning this message, please call me at 415.972.3360.

I thank you for your courtesies.

Sincerely,

Carmen D. Santos, Project Manager

RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360 fax: 415.947.3533

From: Goloubow, Ron

Sent: Monday, June 28, 2010 7:46 PM **To:** 'Santos.Carmen@epamail.epa.gov'

Subject: Aspire School Site in Oakland, California - Conditional Approval of SAP and LFR's

November 18, 2009 Letter
Attachments: Table_1-AirResults-09155.pdf

Carmen as requested I have provided a summary of how the following conditions provided in your email below were addressed at the Subject Site. The responses are in green. Please let me know if this is what you were looking for. If so I will put it on ARCADIS letterhead to make it more formal...

Ron.

Ron Goloubow, PG | Senior Associate Geologist | ron.goloubow@arcadis-us.com

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From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Wednesday, November 25, 2009 10:30 AM

To: Goloubow, Ron

Cc: wilson.patrick@epa.gov; santos.carmen@epa.gov

Subject: PCBs: Aspire School Site in Oakland, California - Conditional Approval of SAP and LFR's November 18, 2009

Letter

Importance: High

Dear Ron Goloubow:

Thank you for submitting the November 18, 2009 letter concerning USEPA's November 13, 2009 conditions of approval for the "Toxic Substances Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California" (prepared by LFR Inc. for Aspire and dated October 23, 2009) and the "Sampling and Analysis Plan (SAP) For the Former Pacific Electric Motors Facility 1009 66th Avenue, Oakland, California November 2009, Prepared under notification requirements of 40 CFR 761.61(a)(3)." We have reviewed both documents, which are attached below. This message addresses clarifications on these documents and USEPA's conditional approval of LFR's Soil Sampling Plan.

A. LFR Inc. November 18, 2009 Letter

Ambient air monitoring for PCB Aroclors in dust at the perimeter of the site. I will consult next week with my colleagues on the perimeter air sampling that LFR has proposed to meet Condition 6 of USEPA's November 13, 2009 approval letter and will get back to LFR on this issue during the week of November 30, 2009. In the meantime, I have some comments regarding the NIOSH method proposed in LFR's November 18, 2009 letter. The NIOSH Method 5503 states that precision of the method has not been evaluated, accuracy of the method has not been determined, range not studied, and for bias, the method indicates that none has been identified. Perhaps other analytical methods could be considered to meet the purpose of Condition 6. In a separate message I am asking some clarifications on the miniRam.

Air monitoring consisting of dust monitoring and the collection and analysis of air samples was conducted in accordance with the procedures provided in the CAP and the letter from LFR to USEPA dated. November 18, 2009. Analytical result of the air samples did not contain pcbs above the laboratory reporting limits in any of the air samples collected at the Site. The draft table summarizing the results of the air monitoring is attached.

<u>Building Materials Sampling Plan.</u> Decontamination of sampling equipment and tools must be in accordance with 40 CFR 761.79(c)(2) as required in approval Condition 3 of USEPA's November 13, 2009 approval letter. The portions of the tools that came in contact with the building materials (trowel, drill bit, and screwdriver) were swabbed with a towels containing hexane. The decontamination materials were disposed of along with the PCB affected soil that was transported to Waste Management's Kettleman Hills Landfill.

<u>Deed Notice.</u> As required in approval Condition 9 of USEPA's November 13, 2009 approval letter, the owner of the property is to submit a written, signed certification to USEPA certifying the required deed notice was recorded in accordance with state law. We have not yet started on this.

<u>Certification required under 40 CFR 761.61(a)(3)(i)(E).</u> The revised written, signed certification meets the requirements of USEPA's conditional approval letter. Okay

B. LFR's November 2009 Soil Sampling Plan - Conditional Approval

The following are the conditions of approval for <u>"Sampling and Analysis Plan (SAP) For the Former Pacific Electric Motors Facility 1009 66th Avenue, Oakland, California November 2009, Prepared under notification requirements of 40 CFR 761.61(a)(3)."</u>

- 1. <u>SAP, Soil cleanup verification sampling.</u> Verification of soil cleanup must be conducted in accordance with 40 CFR 761.61(a)(6) and 40 CFR 761, Subpart O. Refer to the requirements in these regulations. If verification sampling shows that soils are still above the 0.13 cleanup level, soils must be excavated until the cleanup level is achieved as demonstrated through cleanup verification sampling (see 40 CFR 761.61(a)(6)). Soil samples were collected from excavations of PCB-affected soil in accordance with the SAP which required sidewall samples collected approximately every 25 linear feet and bottom samples collected approximately every 400 square feet.
- 2. <u>SAP, Sections 1.1 (Summary information), 1.3 (Target Excavation Levels), 2.2 (Excavation Confirmation Soil Sampling Procedure).</u> As acknowledged in LFR's November 18, 2009 letter, the soil cleanup level for the self implementing cleanup of PCBs at the Aspire site in Oakland is 0.13 mg/kg (ppm) and not 0.39 mg/kg. The soil cleanup level in the LFR Sampling Plan is revised accordingly to reflect the soil cleanup level specified in USEPA's November 13, 2009 conditional approval letter.
- 3. SAP, Section 2.2 (Excavation Confirmation Soil Sampling Procedure). This section states:

"Collect soil samples from the bottom of the excavation on an approximate 30 foot by 30 foot grid, at least one bottom sample will be collected from each excavation." and

"Confirmation soil samples from either the floor or sidewalls that contain 0.39 mg/kg PCB or less shall be a confirmation that high-level PCB soils have been removed. Confirmation soil samples that contain greater than 0.39 mg/kg PCB shall be an indication that the specific grid needs further excavation in order to remove the PCB affected soil from the affected area."

The soil cleanup level referred to in the above cited paragraphs from Section 2.2 of the SAP is changed herein to 0.13 mg/kg (ppm), consistent with USEPA's November 13, 2009 approval letter. Please refer to Item B.1 ("SAP, Soil cleanup verification sampling") above. Done

4. <u>LFR's November 23, 2009 electronic mail message.</u> As agreed on November 23, 2009, LFR will collect six additional soil cleanup verification samples for PCB analysis only from the locations depicted in "blue highlighter" in the attached LFR map. These six soil cleanup verification samples are incorporated herein by reference into LFR's November 2009 SAP and such SAP is the subject of this conditional approval. LFR will also analyze for PCBs soil cleanup confirmation samples that will be collected around the perimeter of the polygon outlined in red and shown in the attached LFR map. LFR is collecting soil samples every 25 feet along the perimeter of this red-outlined polygon area. These samples are Such samples will also be analyzed with other constituents of concern identified at the site. These soil cleanup verification samples are incorporated herein by reference into LFR's November 2009 SAP and such SAP is the subject of this conditional approval. Although not discussed with LFR on November 23, 2009, PCB excavation

areas (e.g., PCB Excavation Area 2) outside of the red-outlined "polygon area" should also be reviewed in similar manner as PCB Excavation Area 3 and the polygon area to determine if additional soil cleanup verification samples are necessary in light of the 0.13 mg/kg cleanup level for PCBs. The detection limit for areas showing that PCBs were not detected should be reviewed to ensure the PCB detection limit used in the sample analysis is below the PCB cleanup level. Done.

- 5. "Additional Soil Sampling" and "Rationale for Additional Soil Sampling" sections in LFR's October 23, 2009 Self Implementing Cleanup Plan. These sections of the self implementing cleanup plan include additional soil characterization samples to be collected in certain areas (e.g., steam sump, beneath and around sewer lines, beneath and around the compressor area) at the Aspire site. These sections of the cleanup plan are incorporated herein by reference into LFR's November 2009 SAP and such SAP is the subject of this conditional approval. Depending on the sampling and analysis results, soil cleanup and cleanup verification may be necessary. Soil sampling must be conducted in accordance with 40 CFR 761, Subpart N. If necessary, based on site characterization sampling and analysis data for the areas described in the cited sections of the LFR October 2009 cleanup plan, soil cleanup and cleanup verification sampling may need to be conducted. Soil cleanup and cleanup verification sampling must be conducted in accordance with 40 CFR 761, Subpart O and 40 CFR 761.61(a)(6). The soil cleanup level for PCBs at the Aspire school site is 0.13 mg/kg. Done
- 6. <u>SAP, Section 2.4 (Sampling Equipment Decontamination).</u> Decontamination of sampling equipment, movable equipment, and tools must be done in accordance with 40 CFR 761.79(c)(2) as required in Condition 3 of USEPA's November 13, 2009. The buckets of the movable equipment was swabbed with a towels containing hexane. The decontamination materials were disposed of along with the PCB affected soil that was transported to Waste Management's Kettleman Hills Landfill.
- 7. SAP, Section 2.4.2 (Management of Investigation Derived Wastes. LFR must follow the requirements in Condition 5 of USEPA's November 13, 2009 approval letter for offsite disposal of all wastes containing PCBs, including among others, soils exceeding the PCB cleanup level of 0.13 mg/kg. Soil excavated from areas of the Site where soil samples contained PCBs at concentrations greater than 50 mg/kg was transported to Waste Management's Kettleman Hills Landfill as "Bulk PCB Remediation Waste". Soil excavated from areas of the Site where soil samples contained PCBs at concentrations less than 50 mg/kg was transported as "Bulk PCB Remediation Waste" to Republic Services Vaso Road Landfill. The building demolition debris including the concrete slab was also transported as Bulk PCB Remediation Waste to Republic Services Keller Canyon Landfill located in Pittsburg, CA.

Please let me know if you have any questions concerning the matters addressed in this message.

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360

fax: 415.947.3533

From: Goloubow, Ron

Sent: Friday, August 13, 2010 5:15 PM

To: 'Santos.Carmen@epamail.epa.gov'; Khatri, Paresh, Env. Health;

Wilson.Patrick@epamail.epa.gov

Cc: Charles Robitaille; Mike Barr; 'Steph Wilson'; Gibbs, Alan; Goldberg Day, Amy; Henricksen,

Dolores; Goloubow, Ron

Subject: Aspire Oakland - TSCA Self-Implementing Report

Dear all - the report documenting the Implementation of the Toxic Substances Control Act Self-Implementing Cleanup Notification at the Former Pacific Electric Motors Facility, 1009 66th Avenue Oakland, California has been prepared. Since the file is 13MB it has been uploaded on to an ARCADIS FTP site. The instructions to access the file on the ARCADIS FTP site are provided below. The file has also been uploaded to the Alameda County FTP site. A hard copy of the report is being sent to Carmen Santos via U.S. Mail. If anyone else would like a "hard copy" please let me know.

Thanks

Ron.

Please use Internet Explorer to go to http://filetransfer.arcadis-us.com/thinclient/ and log in with the following credentials:

Username: arcadisftp

Password: Tr4nsf3R

Then click "From ARCADIS" and look for the folder named: Aspire Oakland TSCA Report

This document will be available for 30 days. If you have any trouble, please let me know.

Ron Goloubow, PG | Senior Associate Geologist | ron.goloubow@arcadis-us.com

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www.arcadis-us.com

From: Goloubow, Ron

Sent: Friday, September 03, 2010 6:45 PM

To: 'Santos.Carmen@epamail.epa.gov'; Wilson.Patrick@epamail.epa.gov

Cc: 'Charles Robitaille'; Gibbs, Alan; Goloubow, Ron Subject: FW: Aspire - EPA TSCA Document Review

Attachments: FIG6 PCBs in soil wCutFill.pdf; FIG7 July 2010 CUT FILL (1).pdf

Carmen - attached are the requested figures for the Aspire project that are to replace existing figures 6 and 7 that were included in the report that was transmitted to you on August 13, 2010. As requested these figures illustrate the areas of the site that will be "cut" and "filled" as part to the redevelopment – construction project. The figures also provide the analytical results for soil samples that are considered "in-place" after the removal action for PCB-affected soil was completed. You will see the email below from Charles Robitaille regarding the review schedule for this TSCA Report.

Lets discuss this project again on Tuesday, September 7th at 11:00 AM, if you are available.

Have a good weekend.

Ron.

Ron Goloubow, PG | Senior Associate Geologist | ron.goloubow@arcadis-us.com

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From: Charles Robitaille [mailto:charles@pacificcharter.org]

Sent: Friday, September 03, 2010 2:22 PM

To: Goloubow, Ron Cc: Gibbs, Alan

Subject: RE: Aspire - EPA TSCA Review

Ron.

We're really running out of time since there is a grading moratorium in Oakland commencing 10/15-4/15 (6 months). September 17 is too late. I need to be pushing significant dirt around by the third week of September and I have to allow for mobilization of by contractor and other "stuff". I need her comments ASAP.

Charles P. Robitaille Senior Project Manager Pacific Charter School Development 2350 El Camino Avenue Sacramento, California 95821-5689 925-698-1118 - Cell 916-941-2477 - Facsimile charles@pacificcharter.org www.pacificcharter.org

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From: Goloubow, Ron

Sent: Wednesday, September 15, 2010 7:00 PM

To: 'Santos.Carmen@epamail.epa.gov'; Wilson.Patrick@epamail.epa.gov; Khatri, Paresh, Env.

Health

Cc: Charles Robitaille; Gibbs, Alan; Goldberg Day, Amy; Goloubow, Ron

Subject: Aspire Oakland - TSCA Encapsulation-Sep10-EM009155

Attachments: let-TSCA Encapsulation-Sep10-EM009155.pdf

The attached letter provides the scope of work that we discussed last week with respect to excavating and encapsulating some surficial soil that was identified as containing PCBs at concentrations greater than the 0.130 mg/kg clean-up goal for the project. Please contact me at your earliest convenience if you have any questions or need any more information.

Ron.

From: Goloubow, Ron

Sent: Friday, June 24, 2011 9:45 PM **To:** Santos.Carmen@epamail.epa.gov

Cc: brad.kettelle@blackwellconstruction.com; hjones@icsinc.tv; michael@pacificcharter.org

Subject: RE: Aspire School Oakland - Sample Plan for Imported - Landscaped Soil

Attachments: let-Sample Plan Import Soil June 2011-EM009155.pdf

This version of the sampling plan includes the collection and analysis of ONE duplicate soil sample as requested by EPA...

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com

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From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Friday, June 24, 2011 6:31 PM

To: Goloubow, Ron

Cc: brad.kettelle@blackwellconstruction.com; hiones@icsinc.tv; michael@pacificcharter.org

Subject: Re: Aspire School Oakland - Sample Plan for Imported - Landscaped Soil

Hello Ron:

Thank you for your sending me the sampling plan for the imported soils. In response to your previous message concerning the duplicate samples, one duplicate samples should be collected. I believe that our criteria for duplicate samples is either 1 duplicate for every 1 to 10 or 1 to 20 samples that are collected.

I will review the plan that you just sent me and will get back to you early next week.

Thank you for your courtesies and have a great evening.

Sincerely, Carmen

Carmen D. Santos, PCB Coordinator RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360 santos.carmen@epa.gov "Failure is simply the opportunity to begin again, this time more intelligently." Henry Ford

----- "Goloubow, Ron" < Ron. Goloubow@arcadis-us.com > wrote: -----

To: Carmen Santos/R9/USEPA/US@EPA

From: "Goloubow, Ron" < Ron.Goloubow@arcadis-us.com>

Date: 06/24/2011 05:51PM

Cc: "michael@pacificcharter.org" < michael@pacificcharter.org >, 'Brad Kettelle' < brad.kettelle@blackwellconstruction.com >, Howard Jones < hjones@icsinc.tv > Subject: Aspire School Oakland - Sample Plan for Imported - Landscaped Soil (See attached file: let-Sample Plan Import Soil June 2011-EM009155.pdf)

Carmen – as requested the sampling plan for soil to be imported to the site for use in the landscaped areas is
attached. This version of the sampling plan takes into account your comments transmitted on June 22, 2011.
We will provide the analytical results for the samples as they become available. Currently, the sampling is
NOT scheduled. Please contact me should you have any questions or need any more information.

Ron.

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From: Goloubow, Ron

Sent: Friday, March 16, 2012 5:06 PM **To:** Santos.Carmen@epamail.epa.gov

Subject: RE: PCBs: Aspire School Site, 66th Avenue, Oakland, California - Request for a Revised

PCB Cleanup Completion Report

Hi Carmen - just to be clear...

ARCADIS is preparing a **SEPARATE-ADDENDUM** to the report entitled "Implementation of the Toxic Substances Control Act Self-Implementing Cleanup Notification at the Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California" dated August 12, 2011 (the "Implementation Report"). The **SEPARATE-ADDENDUM** will document the remedial activities that took place at the site AFTER ARCADIS submitted a Implementation Report. The "**SEPARATE-ADDENDUM** will document/include the following:

- Additional Remedial Actions Conducted at the Site after the Submittal of the Implementation Report (encapsulation of soil that needed to be excavated for the redevelopment project)
- Revised Health Risk Screening Calculations (to include confirmation soil samples collected from the areas that needed to be excavated for the redevelopment project) and the requests from Dr. Wilson.
- Mitigation Measures- Revised TSCA Cap
- Imported Soil for Landscaped Areas (new soil data for imported soil)

The Figures requested in the email dated 10-28-2011 will be included.

The waste disposal information (manifests and a summary of the volumes) were included in Appendix B of the Implementation Report. Since no additional soil was removed from the site thus this data – information will NOT be reissued.

Does EPA want the laboratory lab certificates-reports on a CD or paper copies? Can you confirm that EPA wants laboratory lab certificates-reports for soil samples that failed and passed the clean up criteria?

ARCADIS will include a table that summarizes the volume of soil excavated at each area including where the material disposed.

Will this work? Is this what USEPA was thinking-anticipating?

Please let me know.

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com

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From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Friday, October 28, 2011 11:28 AM

To: Goloubow, Ron

Subject: PCBs: Aspire School Site, 66th Avenue, Oakland, California - Request for a Revised PCB Cleanup Completion

Report

Hello Ron:

You had sent us a document that was supposed to capture the PCB cleanup at the Aspire site in Oakland. However, after we had reviewed that document additional work including additional PCB cleanup was conducted that is not formally captured in any report. The following data gaps must be reconcile in a revised PCB Cleanup Completion Report.

- 1. Additional excavations conducted at the site to remove soil contaminated with PCBs above the cleanup level.
- 2. Consolidation at the Aspire site of certain soils contaminated with PCBs above the cleanup level,
- 3. All changes made to the cap, such as materials, thickness, and incorporation of landscaping areas,
- 4. Revised final risk calculations associated with residual PCB concentrations remaining at the site
- 5. Figures depicting the areas where cleanup levels were achieved, where the cleanup levels were not achieved, and areas where soils contaminated with PCBs above the cleanup level were consolidated.
- 6. Figures depicting the final cap and showing construction details (e.g., materials and thickness of each layer) as well as landscape areas,
- 7. Figures depicting the redevelopment project in its final configuration,
- 8. Figures depicting survey coordinates for the location of soils beneath the cap containing PCBs above the cleanup level,
- 9. Waste disposal information (e.g., volumes of soil disposed of and facility to which it was sent for disposal, table summarizing Hazardous Waste Manifest and other waste transportation documentation for wastes containing PCBs at, above, and below 50 mg/kg),
- 10. Laboratory analytical data for PCB site characterization and cleanup verification samples, and
- 11. Confirmation of the source of fill used in landscape areas at the site in addition to the laboratory analysis data for such fill material.

I want to clarify in reference to the above data or information gaps that our approval of the PCB cleanup notification requires a PCB Cleanup Completion Report be submitted and the report is to contain information listed in the approval letter as well as the information in 40 CFR 761.61(a)(9). In addition, given the risk-based cleanup level established for the Aspire site, the report is to include any risk calculations associated with residual PCB concentrations remaining at the site. Based on conversations that we had with Dr. Patrick Wilson (EPA R9 Senior Toxicologist) and your toxicologist, the risk calculations may have been revised, however, these are not formally included in any report.

In light of the above, I am asking that a revised PCB Cleanup Report be submitted for our review that incorporates all the information required in EPA's approval letter, 40 CFR 761.61(a)(9), and that is responsive to the information data gaps described in this message.

Please let me know the date by which Aspire/Arcadis can submit the requested report to EPA for review.

Thank you for your courtesies and please call me if you have any questions concerning this message.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division USEPA Region 9 415.972.3360

santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!"Dr. Seuss

From: Goloubow, Ron

Sent: Friday, June 22, 2012 7:04 PM
To: Santos.Carmen@epamail.epa.gov

Cc: Hale, Alice Subject: Aspire Oakland

Attachments: Deed Restriction Aspire Oakland - 66th Ave August 2011.doc

Carmen I received your voice mail today about the Aspire site in Oakland.

The summary report will be sent to you on or before Friday, June 29, 2012.

The text for the draft land use covenant is attached for your review.

You mentioned that a letter is being prepared by the county for this project. What was the subject for that letter?

Thanks for you patience.

Ron.

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com

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From: Goloubow, Ron

Sent: Friday, June 29, 2012 4:24 PM **To:** Santos.Carmen@epamail.epa.gov

Cc: Kahlmus D. Eatman (kahlmus@pacificcharter.org); Mala Batra

(Mala.Batra@aspirepublicschools.org); Hale, Alice

Subject: Aspire Oakland - DRAFT Addendum - PCB Cleanup Completion Report

Attachments: Figures 1-7.pdf; Attachment 4 PCB summary.pdf; DRAFT rpt-TSCA Implementation-June

2012-EM009155.doc

The DRAFT addendum to the PCB Cleanup Completion Report for the College for Certain (Aspire) project located at 1009 66th Avenue in Oakland, California is attached.

Specifically the text, figures, and the summary table for the PCB-affected soil (which is a portion of Attachment 4) are included.

The following are being sent to you via regular mail:

Paper copies of the Figures

a CD with the following attachments:

Attachment 1 - Laboratory Analytical Data for Soil Samples

Attachment 2 - Revised Human Health Risk Evaluation

Attachment 3 - Laboratory Analytical Data Report for Imported Soils

Attachment 4 - Waste Disposal Information the attachments, Manifests, laboratory reports

Following the EPA's review of the subject report, we plan on finalizing the report, along with the draft "Operation and Maintenance Plan for Cap Mitigation Measures" and Deed notice for the parcel previously transmitted for review.

Please contact me if you have any questions or need any more information.

Thanks Ron.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

> Via U.S. Postal Service and Electronic Mail Certified Mail Receipt No. 7000 0520 0021 6107 8407

November 13, 2009

Aspire Public Schools, a California non-profit public benefit corporation 1001 22nd Avenue, Suite 100 Oakland, CA 94606 Attention: Mike Barr, CFO

Re:

Polychlorinated Biphenys – U.S. EPA Conditional Approval Under 40 C.F.R. § 761.61(a), Toxic Substances Control Act - "Toxic Substances Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California"

Dear Mr. Barr:

We have reviewed the "Toxic Substances Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California," letter dated October 23, 2009 and prepared by LFR Inc. an Arcadis Company (LFR) for Aspire Public Schools ("Aspire"). The U.S. Environmental Protection Agency Region 9 (USEPA) is approving Aspire's October 23, 2009 Notification with the conditions established in the attached "USEPA Conditional Approval for Aspire Public Schools, 1009 66th Avenue, Oakland, CA PCB Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste."

The LFR letter is intended to serve as the notification and certification ("Notification") required in 40 C.F.R. § 761.61(a) of the Toxic Substances Control Act (TSCA) for a self-implementing on-site cleanup and disposal of polychlorinated biphenyls (PCBs) at the Aspire property at 1009 66th Avenue in Oakland. PCBs are present at the Aspire property ("Aspire site") in soils and a potential exists for PCB-containing manufactured products to be present in structures to be demolished at the site. Aspire plans to redevelop the site as a public school for sixth to 12th grade students.

In addition, the Notification requests a "variance" to the schedule provided in 40 C.F.R. § 761.61(a)(3)(ii). USEPA is granting the requested waiver for the schedule in 40 C.F.R. § 761.61(a)(3)(i) in accordance with 40 C.F.R. § 761.61(a)(3)(iii) and in consideration of financial matters that Aspire claims if not resolved could prevent or further delay construction of the school. However, the owner of the property still needs to obtain a similar written waiver from the California Department of Toxic Substances Control (DTSC) and Alameda County Environmental Health (ACEH) in accordance with 40 C.F.R. § 761.61(a)(3)(iii) and maintain all waivers and other records in accordance with 40 C.F.R. § 761.61(a)(9).

While we recognize that, at an October 27, 2009 meeting with Charles Robitaille (Aspire Charter Schools) and LFR representatives (Aspire consultants), Aspire had sought a cleanup standard of 0.39 mg / kg (ppm), we have decided to approve a cleanup standard of 0.13 ppm, as specified in Condition 7 of

Aspire Public Schools Attn: Mike Barr, CFO November 13, 2009

the attached approval. This cleanup level is consistent with the levels approved by both ACEH and DTSC as being protective of human health, in that it meets the cleanup goal for PCBs in soils corresponding to a 1 x 10^{-6} risk level. This level is also consistent with the TSCA regulations in 40 C.F.R. § 761.61(a)(4)(v) and 761.61(a)(4)(vi).

We look forward to be of assistance to Aspire during implementation of the subject Notification as modified by the attached USEPA approval. Please call Carmen Santos at (415) 972-3360 if you have any questions concerning this approval.

Sincerely

Arleme Kabei Associate Director

Waste Management Division

Enclosure

Cc: Mark Malinowski, DTSC (Chief Schools Unit, Sacramento Office)

Tom Booze, DTSC

Paresh Khatri, Alameda County Environmental Health

Charles Robitaille, Aspire Charter Schools

Alan Gibbs, LFR Inc. an Arcadis Company

Ron Goloubow, LFR Inc. an Arcadis Company

Steve Armann, USEPA R9

Patrick Wilson, USEPA R9

Katherine Baylor, USEPA R9

Carmen Santos, USEPA R9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

November 13, 2009

USEPA Conditional Approval for Aspire Public Schools, 1009 66th Avenue, Oakland, CA PCB Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste

"Toxic Substances Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California," <u>letter</u> dated October 23, 2009 and prepared by LFR an Arcadis Company (LFR) for Aspire Public Schools ("Aspire").

The U.S. Environmental Protection Agency Region 9 (USEPA) is approving with conditions the Aspire October 23, 2009 Notification and Certification ("Notification"). The Notification is required by 40 C.F.R. § 761.61(a) of the Toxic Substances Control Act (TSCA) for a self-implementing on-site cleanup and disposal of polychlorinated biphenyls (PCBs), 40 C.F.R. § 761.61(a), at the Aspire property at 1009 66th Avenue in Oakland. Aspire must implement the terms of the Notification, as modified by the conditions of approval.

This conditional approval does not relieve the owner of the property from complying with all other applicable federal, state, and local regulations and permits. Departure from the approval conditions without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in this approval bars USEPA from imposing penalties for violations of this approval or for violations caused by other activities not covered under the terms of this approval that trigger TSCA PCB requirements.

USEPA Conditions of Approval

- 1. Written, signed certification by owner of Aspire property and party conducting cleanup. The Notification includes an incomplete, unsigned certification. Within two (2) days after the date of this approval, Aspire must submit a revised written, signed Certification including the language under "Certification" in 40 C.F.R. § 761.3 and in 40 C.F.R. § 761.61(a)(3)(i)(E). Both the owner of the Aspire property and the party conducting the cleanup must sign the Certification.
- 2. Pre-demolition survey. As discussed with Aspire on October 27, 2009, Aspire shall conduct a survey and sampling of building materials in structures currently at the site to determine if PCBs are present. We understand that structures at the site were built in 1946. Considering the production period of PCB-containing materials, it is likely that building materials in structures at the site may contain PCBs. Also see Condition 3 below. In addition, the compressor, underground pipelines, and transformer present at the site shall be tested for PCBs.
- 3. Sampling and analysis plan. This sampling plan is to address pre-demolition and pre-cleanup sampling activities as well as post-demolition sampling and PCB cleanup verification sampling. Within two (2) days after the date of this approval, Aspire must submit for USEPA approval a sampling and analysis plan (SAP) describing data quality objectives, sampling procedures, quality assurance / quality

control procedures for sample collection, number of samples to be collected, sample preservation, and chain-of-custody for sample delivery to the analytical laboratory. The SAP must identify the analytical laboratory performing analysis of the samples. In addition, the SAP must include decontamination procedures for movable equipment, tools, and sampling equipment in accordance with 40 C.F.R. § 761.79(c)(2). Aspire must obtain USEPA's written approval of the SAP before beginning sampling activities.

The SAP must include the procedures that Aspire will use to characterize building materials for PCBs in structures currently present at the site and planned for demolition before beginning school construction. Aspire shall follow the requirements in 40 C.F.R. Part 761, Subpart R ("Sampling Non-liquid, Non-Metal PCB Bulk Product Waste for Purposes of Characterization for PCB Disposal in Accordance with 40 C.F.R. § 761.62, and Sampling PCB Remediation Waste Destined for Off-Site Disposal, in Accordance with 40 C.F.R. § 761.61") for sampling of building materials to determine their PCB concentration for disposal.

- 4. Sequence of pre-cleanup PCB soil characterization; pre-demolition sampling (building materials); soil remediation; and soil cleanup verification. We understand that except for certain areas in the northwestern portion of the site, most of the site is paved. Current paving materials will be removed and all above ground structures demolished. The site will be completely bare prior to construction of the school. Within five (5) days after the date of this approval, Aspire shall propose the sequence that Aspire will follow for pre-cleanup PCB soil characterization, pre-demolition sampling, soil remediation, and soil cleanup verification to prevent recontamination of soils with PCBs if building materials in existing structures and underground structures (e.g., piping) contain PCBs.
- **5.** PCB remediation waste; PCB bulk product waste; cleanup wastes; and disposal requirements. PCB remediation wastes and PCB bulk product wastes may be generated at the Aspire site during the PCB cleanup and demolition of structures (e.g., corrugated metal buildings) at the site. As the generator of such waste, Aspire must meet all applicable regulatory requirements for storage and offsite disposal in 40 C.F.R. § 761.61(a)(5) (Site Cleanup) and 761.62 (Disposal of PCB Bulk Product Waste). It is also acceptable to dispose of PCB remediation waste in accordance with 40 C.F.R. §§ 761.60 and 761.70. PCBs are a hazardous waste in California. Aspire must ensure that off-site disposal of PCB wastes also meet all applicable and relevant state and local regulatory requirements. Within five (5) days after the date of this approval, provide to USEPA the EPA identification number which confirms that Aspire has an USEPA identification number to manage the PCB wastes.
 - Bulk PCB remediation wastes (e.g., PCB-contaminated soil, PCB-contaminated concrete). Disposal requirements for bulk PCB remediation waste with PCB concentration less than 50 ppm and equal to or above 50 ppm are contained in 40 C.F.R. §§ 761.61(a)(5)(i)(B)(2)(ii) and 761.61(a)(5)(i)(B)(2)(iii), respectively. Further, the generator must provide written notice to the disposal site of the wastes being shipped for disposal in accordance with 40 C.F.R. § 761.61(a)(5)(i)(B)(2)(iv).

- Non-porous (e.g., metal) surfaces. Non-porous surfaces contaminated with PCBs due to spills of liquid PCBs or the migration of PCBs from a manufactured product applied to these surfaces are bulk PCB remediation wastes. Dispose of these wastes offsite in accordance with 40 C.F.R. § 761.61(a)(5)(ii)(B).
- Porous (e.g., concrete, metal coated with a porous surface) surfaces. Porous surfaces contaminated with PCBs due to spills of liquid PCBs or the migration of PCBs from a product applied to these surfaces are bulk PCB remediation wastes. Dispose of these wastes offsite in accordance with 40 C.F.R. § 761.61(a)(5)(i).
- Liquids (e.g., water). Water contaminated with PCBs at the site (e.g., water generated during excavation of soils due to shallow ground water conditions) must be disposed offsite in accordance with 40 C.F.R. § 761.61(a)(5)(iv) if the PCB concentration in the water is above the applicable standard in 40 C.F.R. § 761.79(b)(1).
- PCB bulk product waste. This waste is defined in 40 C.F.R. § 761.3 and disposal requirements are in 40 C.F.R. § 761.62. This waste category includes materials manufactured with PCBs where the PCB concentration in these materials at the time of designation for disposal is ≥50 ppm.
- Cleanup wastes (e.g., non-liquid cleanup materials, personal protective equipment). Dispose of these wastes in accordance with 40 C.F.R. § 761.61(a)(5)(v).
- 6. Measures to prevent exposure of neighboring community to airborne particulates. In the "Air Monitoring" section of the Notification, Aspire proposes to conduct real-time airborne monitoring for particulates during activities likely to generate dust such as excavation of contaminated soils. This monitoring is proposed in the context of worker health and safety. However, such monitoring shall be expanded to include airborne particulate monitoring to determine if the neighboring community is being exposed to air particulates from the site during dust generating activities including building demolition. Within five (5) days after the date of this approval, submit for review the measures that Aspire will implement (including air monitoring) to prevent exposure of neighboring communities to airborne particulates.

In addition, Aspire shall notify neighboring communities of the soil excavation and building demolition activities to be conducted at the site before beginning such activities.

7. Cleanup levels. Aspire plans on redeveloping the site into a public school, which is a high occupancy area. In 40 C.F.R. § 761.61(a)(4)(vi), USEPA requires a PCB cleanup level for high occupancy areas of ≤ 1 mg / kg (ppm) PCBs. In accordance with 40 C.F.R. § 761.61(a)(4)(vi), USEPA has the authority to specify cleanup levels that are more stringent than ≤ 1 ppm PCBs. USEPA is approving a cleanup level of 0.13 mg / kg (ppm) for PCBs in soils. The DTSC School Program and Alameda County Environmental Health (ACEH) had approved this PCB cleanup level for the Aspire

school site that is the subject of this conditional approval. Refer to the ACEH March 12, 2009 letter to Aspire, which is attached to the cover letter. It is also our understanding that DTSC considers cumulative health risks when addressing school sites with multiple contaminants. The Aspire site has multiple contaminants in soils and ground water.

8. Cap (protective barrier). USEPA requires that a cap be installed at the Aspire proposed school site in accordance with the requirements in 40 C.F.R. § 761.61(a)(7). Please note that Aspire has acquired a property to construct the proposed school that has a long history (1946 – 2008) of industrial activity during which PCB releases occurred at the site. A possibility exists for PCB congeners (i.e., weathered PCB Aroclors that are dioxin-like PCB compounds) to be present at the site due to historic PCB releases. A cap will prevent direct exposure to soils containing these compounds.

In addition, USEPA was not involved with any of the investigations so far conducted at the site prior to Aspire's October 23, 2009 Notification to USEPA. PCB contaminated soils may remain at the site due to potential uncertainties in the characterization and remediation of PCB-contaminated soils at the site; and shallow ground water conditions potentially impacting site characterization and remediation. A potential may also exist for future changes at the school grounds where penetration of barriers (e.g., concrete, asphalt surfaces) preventing exposure to onsite soils may be necessary (e.g., repair of utilities).

9. Risk management plan and deed notice. The regulations in 40 C.F.R. § 761.61(a)(4)(i)(A) do not require further restrictions such as a deed notice when the ≤1 ppm PCB cleanup level for high occupancy is verified as achieved via confirmatory sampling. However, USEPA believes that in addition to Conditions 7 and 8 a risk management plan would be an institutional control protective of children at the future Aspire school.

USEPA is approving the 0.13 ppm PCB soil cleanup level for the Aspire site under the condition that (1) site soils are overlain with asphalt, concrete, and / or other cap (protective barrier) that impedes direct exposure to on-site soils and (2) a deed notice that includes a risk management plan be recorded in accordance with California state law.

Within 30 days after completion of the PCB cleanup, Aspire shall submit for USEPA approval a risk management plan that at a minimum includes:

- A survey of the Aspire property and map clearly depicting all areas where PCBs were encountered and remediated,
- A description of specific activities to be prohibited at the school because of their potential to penetrate protective barriers (e.g., asphalt, concrete) that would expose onsite soils,
- A description of how the teachers, administrators, and staff at the school will be notified of the
 specific activities which are prohibited at the school because of their potential to penetrate
 protective barriers (e.g., asphalt, concrete) that would expose onsite soils and
- The conditions under which penetration or alteration of protective barriers is permitted and the contingencies that must be implemented to prevent exposure to onsite soils.

Within 60 days after completing the PCB cleanup at the Aspire site, pursuant to 40 C.F.R. § 761.61(a)(8), Aspire shall record in accordance with California state law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property (1) That the land has been used for PCB remediation waste disposal and specific activities are prohibited as described in the risk management plan described above; (2) Of the existence of the cap (protective barriers) and the requirement to maintain the protective barriers in perpetuity; and (3) The applicable cleanup levels left at the site, under the cap; and (4) the procedure by which USEPA will be notified of penetrations or alterations of the required cap. In addition, Aspire must submit to USEPA a certification signed by the owner certifying the required deed was recorded.

10. Recordkeeping and PCB cleanup report. The owner of the property must keep records of the PCB cleanup including any cleanup conducted prior to the date of this approval that involved the removal of PCBs from the site. All reports currently available that document PCB cleanup at the site are incorporated herein as part of the Aspire October 23, 2009 Notification. In accordance with 40 C.F.R. § 761.61(a)(9), the owner of the property must keep cleanup records as required in 40 C.F.R. § 761.125(c)(5).

Submit for approval a PCB cleanup report within 30 days after completing the PCB cleanup (including removal and disposal of PCB remediation and bulk product waste). The report must contain all supporting sample analysis results documenting achievement of the PCB cleanup level, data summaries, waste disposal, and all the information required in 40 C.F.R. § 761.125(c)(5).

11. Restoration of the site. After achieving the PCB cleanup level, site restoration shall be done consistent with local and California State regulatory requirements as well as in accordance with the requirements in ACEH's March 12, 2009 letter approving the LFR CAP. The PCB soil cleanup level for the Aspire site is 0.13 ppm. The PCB concentration in the backfill material should not exceed this PCB soil cleanup level.

From: Santos.Carmen@epamail.epa.gov
Sent: Friday, November 13, 2009 5:51 PM

To: Goloubow, Ron; Gibbs, Alan; charles@pacificcharter.org
Cc: Armann.Steve@epa.gov; Wilson.Patrick@epamail.epa.gov

Subject: PCBs: USEPA Conditional Approval of Aspire's Notification - 1009 66th Avenue, Oakland,

CA

Attachments: 11 13 2009 Aspire USEPA Approval PDF BW 1S735.pdf

Greetings, Ron:

Attached is USEPA's letter conditionally approving Aspire's Notification. The original hard copy is being mailed to the property owner and all the recipients of this message.

We received a sampling plan and a revised, signed Certification via Ron Goloubow. This message acknowledges receipt of these documents. The Certification needs to be signed by both the party conducting the cleanup and the owner of the property as required in 40 CFR 761.61(a)(3)(i)(E). The Certification sent by Ron via e-mail message to us only has the owner's signature and it is therefore incomplete. Please resubmit the Certification signed by both the owner (Aspire) and the party conducting the cleanup (LFR Inc.) as required in the cited regulation.

I take this opportunity to answer Ron Goloubow's and Alan Gibbs' question concerning collection of soil cleanup verification samples at the bottom of the excavation areas if ground water enters the excavations. Soil cleanup verification samples must be collected at the bottom of the excavation areas. The laboratory preparation and analysis of these moist soil samples should be conducted in a manner that facilitates analysis of the soils for PCB Aroclors using USEPA Method 8082. Analysis of ground water entering the excavation areas should be conducted without filtering the ground water samples.

Thank you. Please call me if you have any questions concerning the attached conditional approval.

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360 fax: 415.947.3533

To: Goloubow, Ron

Subject: RE: PCBs: Aspire School Site in Oakland, California - Conditional Approval of SAP and

LFR's November 18, 2009 Letter

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Wednesday, November 25, 2009 10:30 AM

To: Goloubow, Ron

Cc: wilson.patrick@epa.gov: santos.carmen@epa.gov

Subject: PCBs: Aspire School Site in Oakland, California - Conditional Approval of SAP and LFR's November 18, 2009

Letter

Importance: High

Dear Ron Goloubow:

Thank you for submitting the November 18, 2009 letter concerning USEPA's November 13, 2009 conditions of approval for the "Toxic Substances Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California" (prepared by LFR Inc. for Aspire and dated October 23, 2009) and the "Sampling and Analysis Plan (SAP) For the Former Pacific Electric Motors Facility 1009 66th Avenue, Oakland, California November 2009, Prepared under notification requirements of 40 CFR 761.61(a)(3)." We have reviewed both documents, which are attached below. This message addresses clarifications on these documents and USEPA's conditional approval of LFR's Soil Sampling Plan.

A. LFR Inc. November 18, 2009 Letter

Ambient air monitoring for PCB Aroclors in dust at the perimeter of the site. I will consult next week with my colleagues on the perimeter air sampling that LFR has proposed to meet Condition 6 of USEPA's November 13, 2009 approval letter and will get back to LFR on this issue during the week of November 30, 2009. In the meantime, I have some comments regarding the NIOSH method proposed in LFR's November 18, 2009 letter. The NIOSH Method 5503 states that precision of the method has not been evaluated, accuracy of the method has not been determined, range not studied, and for bias, the method indicates that none has been identified. Perhaps other analytical methods could be considered to meet the purpose of Condition 6. In a separate message I am asking some clarifications on the miniRam.

<u>Building Materials Sampling Plan.</u> Decontamination of sampling equipment and tools must be in accordance with 40 CFR 761.79(c)(2) as required in approval Condition 3 of USEPA's November 13, 2009 approval letter.

<u>Deed Notice.</u> As required in approval Condition 9 of USEPA's November 13, 2009 approval letter, the owner of the property is to submit a written, signed certification to USEPA certifying the required deed notice was recorded in accordance with state law.

<u>Certification required under 40 CFR 761.61(a)(3)(i)(E).</u> The revised written, signed certification meets the requirements of USEPA's conditional approval letter.

B. LFR's November 2009 Soil Sampling Plan - Conditional Approval

The following are the conditions of approval for <u>"Sampling and Analysis Plan (SAP) For the Former Pacific Electric Motors Facility 1009 66th Avenue, Oakland, California November 2009, Prepared under notification requirements of 40 CFR 761.61(a)(3)."</u>

1. <u>SAP, Soil cleanup verification sampling.</u> Verification of soil cleanup must be conducted in accordance with 40 CFR 761.61(a)(6) and 40 CFR 761, Subpart O. Refer to the requirements in these regulations. If

verification sampling shows that soils are still above the 0.13 cleanup level, soils must be excavated until the cleanup level is achieved as demonstrated through cleanup verification sampling (see 40 CFR 761.61(a)(6)).

- 2. <u>SAP, Sections 1.1 (Summary information), 1.3 (Target Excavation Levels), 2.2 (Excavation Confirmation Soil Sampling Procedure).</u> As acknowledged in LFR's November 18, 2009 letter, the soil cleanup level for the self implementing cleanup of PCBs at the Aspire site in Oakland is 0.13 mg/kg (ppm) and not 0.39 mg/kg. The soil cleanup level in the LFR Sampling Plan is revised accordingly to reflect the soil cleanup level specified in USEPA's November 13, 2009 conditional approval letter.
- 3. SAP, Section 2.2 (Excavation Confirmation Soil Sampling Procedure). This section states:

"Collect soil samples from the bottom of the excavation on an approximate 30 foot by 30 foot grid, at least one bottom sample will be collected from each excavation." and

"Confirmation soil samples from either the floor or sidewalls that contain 0.39 mg/kg PCB or less shall be a confirmation that high-level PCB soils have been removed. Confirmation soil samples that contain greater than 0.39 mg/kg PCB shall be an indication that the specific grid needs further excavation in order to remove the PCB affected soil from the affected area."

The soil cleanup level referred to in the above cited paragraphs from Section 2.2 of the SAP is changed herein to 0.13 mg/kg (ppm), consistent with USEPA's November 13, 2009 approval letter. Please refer to Item B.1 ("SAP, Soil cleanup verification sampling") above.

- 4. LFR's November 23, 2009 electronic mail message. As agreed on November 23, 2009, LFR will collect six additional soil cleanup verification samples for PCB analysis only from the locations depicted in "blue highlighter" in the attached LFR map. These six soil cleanup verification samples are incorporated herein by reference into LFR's November 2009 SAP and such SAP is the subject of this conditional approval. LFR will also analyze for PCBs soil cleanup confirmation samples that will be collected around the perimeter of the polygon outlined in red and shown in the attached LFR map. LFR is collecting soil samples every 25 feet along the perimeter of this red-outlined polygon area. These samples are Such samples will also be analyzed with other constituents of concern identified at the site. These soil cleanup verification samples are incorporated herein by reference into LFR's November 2009 SAP and such SAP is the subject of this conditional approval. Although not discussed with LFR on November 23, 2009, PCB excavation areas (e.g., PCB Excavation Area 2) outside of the red-outlined "polygon area" should also be reviewed in similar manner as PCB Excavation Area 3 and the polygon area to determine if additional soil cleanup verification samples are necessary in light of the 0.13 mg/kg cleanup level for PCBs. The detection limit for areas showing that PCBs were not detected should be reviewed to ensure the PCB detection limit used in the sample analysis is below the PCB cleanup level.
- 5. "Additional Soil Sampling" and "Rationale for Additional Soil Sampling" sections in LFR's October 23, 2009 Self Implementing Cleanup Plan. These sections of the self implementing cleanup plan include additional soil characterization samples to be collected in certain areas (e.g., steam sump, beneath and around sewer lines, beneath and around the compressor area) at the Aspire site. These sections of the cleanup plan are incorporated herein by reference into LFR's November 2009 SAP and such SAP is the subject of this conditional approval. Depending on the sampling and analysis results, soil cleanup and cleanup verification may be necessary. Soil sampling must be conducted in accordance with 40 CFR 761, Subpart N. If necessary, based on site characterization sampling and analysis data for the areas described in the cited sections of the LFR October 2009 cleanup plan, soil cleanup and cleanup verification sampling may need to be conducted. Soil cleanup and cleanup verification sampling must be conducted in accordance with 40 CFR 761, Subpart O and 40 CFR 761.61(a)(6). The soil cleanup level for PCBs at the Aspire school site is 0.13 mg/kg.
- 6. <u>SAP, Section 2.4 (Sampling Equipment Decontamination).</u> Decontamination of sampling equipment, movable equipment, and tools must be done in accordance with 40 CFR 761.79(c)(2) as required in Condition 3 of USEPA's November 13, 2009.

7. <u>SAP, Section 2.4.2 (Management of Investigation Derived Wastes.</u> LFR must follow the requirements in Condition 5 of USEPA's November 13, 2009 approval letter for offsite disposal of all wastes containing PCBs, including among others, soils exceeding the PCB cleanup level of 0.13 mg/kg.

Please let me know if you have any questions concerning the matters addressed in this message.

Sincerely,

Carmen D. Santos, Project Manager RCRA Corrective Action Office Waste Management Division USEPA Region 9 415.972.3360

fax: 415.947.3533



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

Via U.S. Postal Service and Electronic Mail

June 16, 2011

Mr. Mike Barr
College for Certain, LLC - Aspire Public Schools
Chief Financial Officer
1001 22nd Avenue, Suite 100
Oakland, CA 94606

of Polychlorinated Biphenyls' Cleanup Notification Under Toxic Substances Control Act - New Aspire Public School, 1009 66th Avenue, Oakland, California – USEPA November 13, 2009 Approval Request for Additional Cap Modification

Dear Mr. Barr:

40 CFR 761.61(a) (self-implementing PCB cleanup) requires a cap be constructed at the entire Aspire site consistent with the requirements in 40 CFR 761.61(a)(7) for a concrete cap. Such a cap is required 761.61(a)(7). On November 13, 2009, the U.S. Environmental Protection Agency, Region 9 (USEPA) approved with conditions the October 23, 2009 "Toxic Substances Control Act Self-Implementing to be 6 inches thick. Oakland, California" (Notification) prepared by Arcadis for Aspire Public Schools. That approval under Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in biphenyls (PCBs) required under the Toxic Substances Control Act (TSCA) regulations in 40 CFR College for Certain, LLC additional modifications to the cap for soils contaminated with polychlorinated This letter responds to Ron Goloubow's (Arcadis) April 25, 2011 letter requesting on behalf of

design also modified the site-wide cap. The rat slab is a portion of the site-wide cap that USEPA required in its November 13, 2009 conditional approval of the October 23, 2009 Notification for the Aspire school site. USEPA's April 5, 2011 approved the rat slab design that Arcadis had proposed in March 2011 and such excluding those areas of the cap where rat slabs will be constructed for the school's modular buildings. In the attached letter, Arcadis is proposing an alternate cap design for the entire site-wide cap and

described in Figure 2 (Proposed Pavement Plan) of that letter differ from the cap requirements in 40 The additional cap modifications proposed in the attached Arcadis' April 25, 2011 letter and

Region 9). ¹Letter from Ron Goloubow (Arcadis) dated April 25, 2011 (Subject: "Proposed Toxic Substances Control (TSCA) Cap for Pavement Areas – Former Pacific Motors Facility, 1009 66th Avenue, Oakland, California") to Carmen Santos (USEPA

Re: Aspire Public Schools – Cap Modification and Modification of USEPA's November 13, 2009 Approval Letter Date: June 16, 2011

proposed in the October 2009 Notification consistent with the cap requirements in 40 CFR 761.61(a)(7). construct the proposed landscape areas; and those areas were not a feature of the original site-wide cap CFR 761.61(a)(7) and include landscape areas. Figure 2 also describes the soils that will be used to

We are approving the proposed design for the site-wide cap (excluding the already approved design for the rat slab areas) and landscape areas described in the attached Arcadis' letter under the TSCA November 13, 2009 conditional approval letter. approval modifies the site-wide cap (excluding the rat slabs) required in Condition 8 of USEPA's regulations in 40 CFR 761.61(c) (risk-based cleanup option) with the conditions established below. This

Conditions of Approval for Additional Site-Wide Cap Modifications

Imported Soil for Use at the Aspire Site. Within 15 days after the date of this approval, please submit a summary of the sampling approach that Arcadis will use to collect samples of imported samples must be collected instead of composite samples. cleanup level of 0.13 mg/kg total PCBs as Aroclors. The levels of non-PCB contaminants must be guidance in developing the required summary. PCBs in the imported soil must be below the site Advisory Clean Imported Fill Material," dated October 2001 or latest revision should be used as site. This summary should also be submitted to the Alameda County Department of Environmental soils planned to be used at the Aspire site in the landscape areas and possibly at other areas of the below the criteria referenced in the Advisory as modified by recent criteria updates. Discrete soil Health (ACDEH). The California Department of Toxic Substances Control (DTSC) "Information

also be provided to ACDEH. samples, please submit the laboratory analysis results to USEPA for review before imported soils are placed in the landscape areas designated in Figure 2 of the attached Arcadis' letter. This data must Within 10 days after Arcadis' receipt of the laboratory analytical results for the imported soil

5 derived from trench excavations at the site that have not been tested for PCBs and other non-PCB have been tested as required in Condition 1 above. This requirement is based on the fact that soils the site-specific cleanup level of 0.13 total PCBs as Aroclors. The 10-inch native soil layer proposed areas will consist of an 18-inch layer of cement-treated site soils (bottom layer), a 10-inch soil layer Proposed Landscape Areas. As described in the attached Arcadis' letter, the proposed landscape fruits, and vegetables should not be planted in the proposed landscape areas. contaminants are proposed for use in the 10-inch soil layer for the landscape areas. Edible plants to be added above the 18-inch cement-treated soil layer must be replaced with imported soils that imported soils. According to Arcadis, the bottom soil layer contains PCBs at concentrations below (middle layer) from soils excavated at the site during trenching, and a 12-inch layer (top layer) of

Aspire Public Schools – Cap Modification and Modification of USEPA's November 13, 2009 Approval Letter : June 16, 2011

- 'n Notification to Alameda County Department of Environmental Health (ACDEH). The ACDEH must be notified of the proposed changes to the site-wide cap and inclusion of landscape areas in the cap design given the County's regulatory involvement with the Aspire site.
- 4 Modified Site-Wide Cap. Approval of the modified site-wide cap is only in context to the ability of such cap to prevent human and ecological exposures to PCB levels remaining at the site consistent with the cap requirements in USEPA's November 13, 2009 letter approving the Notification and the properly support any estimated load(s) used in developing the cap design. TSCA regulations. This approval does not cover structural issues related to the ability of the cap to

and the requirements in that Condition are equivalent and consistent with the requirements in 40 CFR approving Aspire's Notification. Condition 9 requires maintenance and repair of the cap in perpetuity 761.61(a)(8). This approval does not modify Condition 9 in USEPA's November 13, 2009 letter conditionally

concerning this letter. approval letter. Please call Carmen Santos of my staff at 415.972.3360 if you have any questions the site-wide cap as modified by the conditions of approval herein and in USEPA's April 5, 2011 work remaining in the Notification as modified by the conditions of approval; and to the construction of We look forward to being of assistance to College for Certain, LLC during implementation of the

Sincerely,

Jeff Scott, Director Waste Management Division

Enclosures (1)

Cc: Ron Goloubow, Arcadis
Michael Rueda, Pacific Charter School Development Paresh Khatri, Alameda County Environmental Health

Arlene Kabei, USEPA R9

Steve Armann, USEPA R9

Carmen Santos, USEPA R9



Ms. Carmen Santos
U.S. Environmental Protection Agency, Region 9
Mail Code WST-5
75 Hawthorne Street
San Francisco, California 94105

sent via email only

1900 Powell Street 11th Floor Emeryville; CA 94608 Tel 510.652.4500 Fax 510.652.4906 www.arcadis-us.com ARCADIS U.S., Inc.

Environmental

Subject

Proposed Toxic Substance Control Act (TSCA) Cap for Pavement Areas -Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California

Dear Ms. Santos:

specific clean-up goal of 0.135 milligrams per kilogram. As we have discussed, PCBmay contain polychlorinated biphenyls (PCBs) at concentrations greater than the site installed at 1009 66th Avenue in Oakland, California ("the Site"; Figures 1, and 2). Substance Control Act (TSCA) Cap for pavement and landscaped areas to be prepared this letter to provide the revised details regarding the design of the Toxic provided below, that soil would be covered by a minimum of 6 to 13 inches of cap the cement treated soil. Depended upon the pavement and landscaping design affected soil that might remain at the Site would likely be located within the interval of The purpose of the cap is to prevent human and ecological exposure to any soil that On behalf of College for Certain, LLC (CFC), ARCADIS U.S., Inc. (ARCADIS) has material (see pavement details on Figure 2).

> Date: April 25, 2011

Contact:
Ron Goloubow

510.596.9550

Phone:

E-mail: ron.goloubow@arcadis-us.com

Our ref: EM009155.0010.00001

Proposed Pavement Design

depended upon the specific traffic - Site use in the area. Figure 2. As illustrated there are six different designs for pavement thicknesses The details regarding the proposed pavement design for the Site is illustrated on

the ground surface): The proposed TSCA Cap designs will be comprised as follows (from the bottom up to

Trash Enclosure Area

- Native soil
- 18 Inches of cement treated native soil
- 6 Inches of imported aggregate base rock and
- 6- Inches of Portland cement concrete

Pedestrian Walkway Areas - Concrete

- Native soil
- 18 Inches of cement treated native soil
- 4- Inches of imported aggregate base rock and
- 4- Inches of Portland cement concrete

Vehicle Traffic Areas

- Native soil
- 18 Inches of cement treated native soil
- 10- Inches of imported aggregate base rock and
- 3- Inches of asphalt concrete

Parking Areas

- Native soil
- 18 Inches of cement treated native soil
- 8- Inches of imported aggregate base rock and
- 2.5- Inches of asphalt concrete

Pedestrian Walkway Areas - Asphalt

- Native soil
- 18 Inches of cement treated native soil
- 4- Inches of imported aggregate base rock and
- 2- Inches of asphalt concrete

Landscaped Areas

- Native soil
- 18 Inches of cement treated native soil
- 10- Inches of native soil
- 12- Inches of imported top soil

Closing

described above. Blackwell Construction (on behalf of CFC) is in the process of installing the modular (re-locatable) buildings. The next phase of the construction project at the Site will be to install the "hard-scape" that will include the asphalt and concrete pavement area

ARCADIS

appreciate working with you and your team and look forward to bringing this project ARCADIS will contact representatives of U.S. EPA on Monday, May 2, 2011 to determine if the design provided in this letter is acceptable. We at ARCADIS to closure with the U.S. EPA in the near future.

Sincerely,

ARCADIS U.S., Inc.

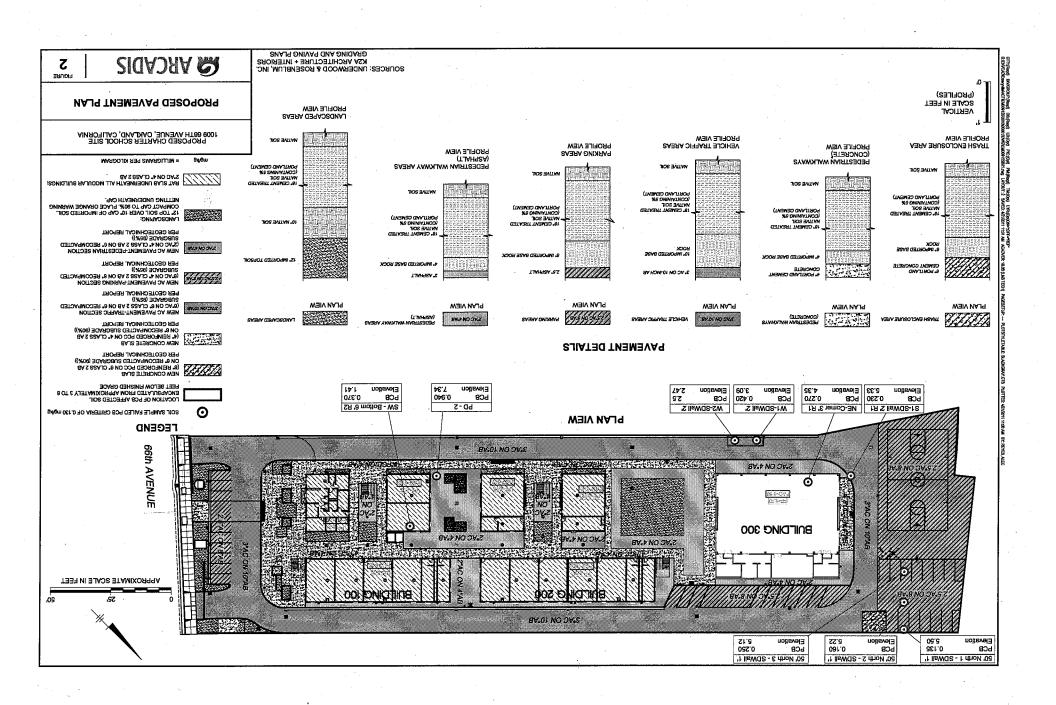
Ron Goloubow, P.G. Principal Geologist

Copies:

Mike Rueda – Pacific Charter Schools Brad Kettle – Blackwell Construction

Enclosures:

Figure 1 – Site Vicinity Map
Figure 2 – Proposed Pavement Plan



From: Santos.Carmen@epamail.epa.gov Sent: Tuesday, November 27, 2012 4:44 PM

To: Goloubow. Ron

RE: Aspire School - Oakland, CA - Deed Notice and Operation and Maintenance Plan Subject:

Hello Ron:

I am still working on your project. I was out most of last week and the week before that I was very sick. All that resulted in a setback of my reviews of the different Aspire documents. I feel terrible about that set back and I am trying my best to get your project wrapped up from our end.

Toward the end of this week I will give you another update.

Thank you for your patience.

Sincerely, Carmen

Carmen D. Santos **PCB** Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division **USEPA Region 9** 415.972.3360 santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

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"Goloubow, Ron" < Ron. Goloubow@arcadis-us.com> From:

Carmen Santos/R9/USEPA/US@EPA, To:

11/27/2012 07:07 AM

RE: Aspire School - Oakland, CA - Deed Notice and Operation and Maintenance Plan Subject:

Any update???

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608 T. 510.596.9550 | M. 510.501.1789 | F. 510.652.4906 www.arcadis-us.com

From: Goloubow, Ron

Sent: Wednesday, October 24, 2012 2:40 PM

To: 'Carmen Santos'

Subject: FW: Aspire School - Oakland, CA - Deed Notice and Operation and Maintenance Plan

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608 T. 510.596.9550 | M. 510.501.1789 | F. 510.652.4906 www.arcadis-us.com

From: Goloubow, Ron

Sent: Friday, October 28, 2011 9:45 AM

To: Santos.Carmen@epamail.epa.gov; paresh.khatri@acgov.org **Cc:** 'Kahlmus Eatman'; ramiro@pacificcharter.org; 'Mala Batra'

Subject: Aspire School - Oakland, CA - Deed Notice and Operation and Maintenance Plan

Dear Carmen & Paresh.

The draft deed notice and operation and maintenance plan for the subject site is attached for your review. Following your review of these documents we would like to finalize and record these documents. Please contact me with regard to your schedule for reviewing the attached materials so that we can plan accordingly.

Ron.

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608 T. 510.596.9550 | M. 510.501-1789 | F. 510.652.2246 www.arcadis-us.com

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From: Santos.Carmen@epamail.epa.gov
Sent: Santos.Carmen@epamail.epa.gov
Thursday, December 06, 2012 2:27 PM

To: Goloubow, Ron

Subject: PCBs: Aspire Site in Oakland, California - Files in CD ROM cannot be read

Hello Ron:

The information that you included in the CD ROM containing the attachments to the June 29, 2012 Addendum Report cannot be read. Please send the attachments in a new CD ROM and via US Postal Service mail. We are trying to complete the review of the Aspire remediation and risk assessment and cannot because the documents that were uploaded into the CD ROM cannot be read.

Thank you for your courtesies. I look forward to receiving a new CD ROM and hard copies of the attachements via US Postal Service.

Sincerely, Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

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From: Santos.Carmen@epamail.epa.gov Sent: Monday, December 10, 2012 8:04 PM

To: Goloubow, Ron

Cc: Wilson.Patrick@epamail.epa.gov

Subject: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and

Other Documents

Attachments: EPA ASPIRE PUBLIC SCHOOLS MANIFESTS THREE.pdf; Environmental Restriction

Template.doc

Hello Ron:

Below are my comments on several documents that you submitted for review. We discussed many of these comments during our conference call on December 7, 2012. Please make revisions responsive to the comments and consistent with the December 7, 2012 conference call.

Please send us a CD-ROM containing the appendices or attachments to the Addendum since the original CD-Rom appears to be defective.

In reference to the O&M Plan, given the significance of the matters covered in Sections 4. through 8. of that plan, please schedule a conference call to go over those sections of the plan. After that future call, I may have additional comments on the O&M Plan. For now, comments on the O&M Plan are included in comments 14 through 19.

Addendum Report (PCB cleanup report)

Pages 2 to 3, Last bullet ("Revised figures showing: . . .")

- 1. Addendum. The sub-bullet under the Last bullet states that "Areas where cleanup levels were achieved, where the cleanup levels were not achieved and where soils contaminated with PCBs above the cleanup level were encapsulated. . . "The sub-bullet should be expanded to clarify that "encapsulated" soils are beneath the cap and the depth at which the "encapsulated" soils are located beneath the cap.
- 2. Addendum. Figure 3 ("System Plan Showing Pavement Plan / Cap In-Place Soil Exceeding PCB Cleanup Goals"). We were under the understanding that Arcadis had agreed to excavate and consolidate in the W1-SDWall 2' and W2-SDWall 2' area all the soils that exceeded the cleanup level at the site. Please clarify if that approach was followed. If a different approach was followed the Report should be revised to explain how soils above the PCB cleanup level was handled. Comparison of Figure 3 to the table ("Post-Demolition Surface Soil Samples") on page 3 indicates that except for PD-1, PD-2, and PD-6, the remaining data in that table is not included in Figure 3. Is Figure 3 supposed to show the PCB concentrations summarized in the table found in page 3? Please clarify. In addition, if all soils containing PCBs above the cleanup level were consolidated in the W1-SDWall 2' and W2-SDWall 2' area, or consolidated in another area in addition to the W1 and W2 areas, or left in place in addition to been consolidated in a specific area then Figure 3 should include clarification notes addressing this matter. Please revise the text of the Report and Figures in response to this comment.
- 3. Addendum. The Report states in page 3 that "An area measuring approximately 10 feet long by 10 feet wide by 2 feet below grade was excavated at each of three locations (PD-3, PD-4, and PD-5; see Figure 3)." However, the locations PD-3 through PD-5 are not depicted in Figure 3. In addition, the Report does not state whether the soils removed from PD-3 through PD-5 were disposed offsite or consolidated onsite. Please clarify the fate of the soils excavated from PD-3 through PD-5 and PD-1, PD-2, and PD-6.

Pages 9 to 10 of the Report:

4. Addendum. What is the in-situ PCB concentration for soils in EXC-PCB2, EXC-PCB3, EXC-PCB4, and EXC4? In addition, please also confirm the concentration of PCBs in soils from EXC4 that were mixed with soils from the other excavations. According to the report the soil was stockpiled and sampled for PCBs to determine the PCB concentration for disposal. And the soils were disposed of at the Republic Services Keller Canyon Landfill which is a construction debris landfill. The in-situ concentration and not the concentration of PCBs in the stockpiled soils should had been used to

determine the disposal method and facility as required in the regulations. Also, according to the report, EXC4 soils contained PCBs above 50 mg/kg. Please revise the Report to address the needed clarifications.

- 5. Addendum. The Report states that copies of manifest numbers: 005417521JJK, 005417522JJK, and 005417534JJK have not been received from Kettlemann. USEPA requested that Kettleman provide copies of those manifests. Attached are the pdf files containing that information.
- 6. Addendum. What was the PCB concentration in concrete and other debris consolidated at the site and disposed of at the Republic Services' Keller Canyon Landfill? Was the concentration of PCBs in each of the different materials (e.g., wood, concrete) below 50 mg/kg total PCBs?
- 7. Addendum. Nomenclature for sample identification codes is inconsistent within the Report and the Figures in the Report. These inconsistencies need to be reconciled.
- 8. Addendum. Soil Disposal Summary. Please review the table and text in reference to the disposal summary and clarify the waste classifications. For instance, PCB remediation waste with PCB concentrations above the cleanup level is being regulated by TSCA for disposal. The difference is in the disposal options based on PCB concentration. 50 ppm and higher, disposal in TSCA or RCRA/TSCA landfill. less than 50 ppm, disposal in TSCA, RCRA/TSCA, municipal solid waste, or construction debris landfill. California regulates PCBs at 50 ppm and higher as a hazardous waste.

Page 5, Revised health risk screening calculations

9. Addendum. The report should explain the meaning of the estimated risk in context to the mitigation measures (e.g., cap) applied to the site to mitigate health risks. The protectiveness of the mitigation measures should be explained in context to the risk reduction that they provide.

Figures

10. Addendum. All figures must be revised to accurately depict the actual PCB residual concentrations and location of those concentrations at the site and actual areas where soils contaminated with PCBs above the cleanup level were consolidated. The figures must also be revised to accurately depict all sampling areas; and sample identification codes for samples representing remaining residual PCB concentrations at the site.

Soil Management Plan (SMP)

- 11. SMP. General comment. The soil management plan must be revised to reflect final conditions at the site and to be consistent with the final PCB cleanup report.
- 12. SMP. Section 4. Soil Remediation. The second paragraph in Section 4: "The most likely location for affected soil to be encountered during redevelopment activities is along the property boundary at the northwestern portion of excavation PCB3 and the property boundary at the northeastern portion of excavation EXC4." This paragraph is inconsistent with Figure 3 of the Addendum Report and must be revised.
- 13. SMP. The plan must be revised to include actions that will be taken to properly manage soils containing PCBs during post- redevelopment activities, such as during repairs to the cap and repairs to below ground utilities.

<u>Draft Operation and Maintenance Plan for Cap Mitigation Measures (O&M Plan)</u>

14. Cap O&M Plan. General comment. The Cap O&M Plan must be revised to accurately capture current conditions at the site and the final cap as described in the Addendum Report. The Cap O&M Plan, Addendum Report, Soil

Management Plan, and Restricted Covenant should be accurate and the information presented not conflict among these documents. Figures presented in all these documents must present consistent and accurate data.

- 15. Cap O&M Plan. The cap is to be maintained in perpetuity.
- 16. Cap O&M Plan. Section 1.2.2 (Self-Implementing Cleanup Plan), Paragraph 6. The information presented in this paragraph is incomplete. Based on Figure 3 in the Addendum Report, PCBs above the cleanup level were left in place at several locations in addition to the W1-WSDWall 2' and W2-WSDWall 2' areas.
- 17. Cap O&M Plan. A restrictive covenant has been prepared for EPA review and not a deed notification.
- 18. Cap O&M Plan. Section 4.1 (Periodic Inspections). Please describe the training that will be given to school staff proposed to conduct inspections of the cap and provide the qualifications of such personnel to conduct the cap inspections and repairs.
- 19. Please propose a convenient time for a conference call to discuss Section 4. (O&M Inspections), Section 5. (Intrusive Work Activities, Section 6. (Reporting and Recordkeeping), Section 7. (Site Access), and Section 8. (Variance, Modification, or Termination of O&M Plan).

Covenant and Environmental Restriction on 1009 66th Avenue, Oakland, California

20. Covenant. EPA should be a beneficiary and not a covenantee under the Covenant. Attached is an example template of a restrictive covenant for your use in revising the restrictive covenant for the Aspire site. A restrictive covenant is necessary for the site to ensure the cap is monitored, maintained, and repaired in <u>perpetuity</u>; and that proper procedures are in place for protection of human health and the environment in case the cap is breached to conduct post redevelopment activities such as repairs to underground utilities.

- 21. Covenant. The information in the covenant needs to be updated to reflect completion of the final PCB remedy at the site and revised cleanup completion reports..
- 22. Covenant. In addition to referencing several documents in the covenant such as the Soil Management Plan, Operation and Maintenance Plan for the Cap, and Addendum Report, we recommend the following information be included in applicable articles of the covenant:
 - Full description and survey coordinates for the cap.
 - Figure depicting accurate location and survey coordinates for cleanup verification samples that exceed the
 cleanup level; and location of consolidated soils containing PCBs. The current figures are not accurate and do not
 depict all locations where residual PCB concentrations above the cleanup level remain at the site. The exhibits to
 the covenant need to be revised to reflect accurate information. For example, the "Lands of College for Certain,
 LLC PCB Encapsulated Area" does not include all areas at the site where PCBs in soils exceed the cleanup
 level.
 - Additional figures as necessary.
 - Text explaining the cap must be operated, maintained, and repaired in perpetuity. Modifications to the cap require EPA approval before making the modifications.
 - Land use or zoning for the Aspire property.
 - Post-redevelopment management of soils that contain PCBs.
 - Cap monitoring (or inspection), maintenance, and repair activities including frequency of inspections and schedules for inspections and repairs. Revised cap inspection form.
 - In case that a residential redevelopment is decided in the future to be built in the area of the Aspire school, additional soil cleanup may be necessary.
 - Management of soils and contingencies when replacing vegetation (e.g., plants, shrubs, trees) in the planters.
 - Revised legal descriptions including Parcel 1, Parcel 2, and the PCB Encapsulated Area.

23.	Covenant.	The revised covenant should undergo legal review before resubmitting the document for EPA review.
	•	
****	******	********

Please let me know if you have any questions concerning the above comments.

Sincerely, Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

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From: Santos.Carmen@epamail.epa.gov
Sent: Santos.Carmen@epamail.epa.gov
Thursday, January 31, 2013 2:47 PM

To: Khatri, Paresh, Env. Health

Cc: Goloubow, Ron

Subject: Fw: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and

Other Documents

Attachments: EPA ASPIRE PUBLIC SCHOOLS MANIFESTS THREE.pdf; Environmental Restriction

Template.doc

Hello Paresh:

I hope 2013 is going well for you so far.

This message is to update you on EPA's next steps regarding the Aspire School site in Oakland. We reviewed the report and the deed restriction. The message attached below contains our comments on the Addendum Report that Arcadis had sent to us for review. Ron Goloubow will be sending a redline/strike out revised draft Addendum Report by the end of next week to us. We hope that all issues associated with the report and any related to the deed restrictions are resolved by the end of March 2013. We have a

We still need to receive a revised deed restriction that meets our requirements. EPA would be a third party beneficiary. Do you know if the Alameda County Environmental Health will be the Covenantee on the Aspire deed restriction? Please let me know. Thank you.

Please call me if you have any questions concerning this message.

Sincerely, Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
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---- Forwarded by Carmen Santos/R9/USEPA/US on 01/31/2013 11:21 AM -----

From: Carmen Santos/R9/USEPA/US
To: Ron.Goloubow@arcadis-us.com,
Cc: Patrick Wilson/R9/USEPA/US@EPA

Date: 12/10/2012 05:03 PM

Subject: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and Other Documents

Hello Ron:

Below are my comments on several documents that you submitted for review. We discussed many of these comments during our conference call on December 7, 2012. Please make revisions responsive to the comments and consistent with

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Nork Activities, Section 6. (Reporting and Recordkeeping), Section 7. (Site Access), and Section 8. (Variance, Modification, or Termination of O&M Plan).		

Covenant and Environmental Restriction on 1009 66th Avenue, Oakland, California		
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 Revised legal descriptions including Parcel 1, Parcel 2, and the PCB Encapsulated Area. 		
23. Covenant. The revised covenant should undergo legal review before resubmitting the document for EPA review.		
•		
Please let me know if you have any questions concerning the above comments.		
Sincerely, Carmen		

PCB Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division USEPA Region 9 415.972.3360 santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

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From: SANTOS, CARMEN <Santos.Carmen@epa.gov>

Sent: Tuesday, March 05, 2013 2:14 PM

To: Goloubow, Ron

Subject: RE: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and

Other Documents

Hello Ron:

Thank you for sending the revised PCB cleanup completion report. I started to review it. Are the attachments larger than 25 MBs? I am working from home today and do not have the CD ROM here. Would you be able to send any attachments that I may need? Please let me know.

In addition, would you be interested in an example of a land use covenant for a site where a cap was constructed to cover PCB contaminated soils? For the Aspire site we have required a land use covenant. Please let me know if interested and I will send you the most recent example of a land use covenant for a California site involving caps for PCB contaminated soils.

Thank you for your patience and courtesies.

Regards, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: Goloubow, Ron [mailto:Ron.Goloubow@arcadis-us.com]

Sent: Friday, March 01, 2013 12:34 PM

To: SANTOS, CARMEN

Subject: RE: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and Other Documents

Carmen I have completed the revisions to the addendum report. I am moving on to the soil management plan and operation plan. If you would like to review the revised text of the report; it is attached...

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com

ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608 T. 510.596.9550 | M. 510.501.1789 | F. 510.652.4906 www.arcadis-us.com

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Monday, December 10, 2012 5:04 PM

To: Goloubow, Ron

Cc: Wilson.Patrick@epamail.epa.gov

Subject: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and Other Documents

Hello Ron:

Below are my comments on several documents that you submitted for review. We discussed many of these comments during our conference call on December 7, 2012. Please make revisions responsive to the comments and consistent with the December 7, 2012 conference call.

Please send us a CD-ROM containing the appendices or attachments to the Addendum since the original CD-Rom appears to be defective.

In reference to the O&M Plan, given the significance of the matters covered in Sections 4. through 8. of that plan, please schedule a conference call to go over those sections of the plan. After that future call, I may have additional comments on the O&M Plan. For now, comments on the O&M Plan are included in comments 14 through 19.

Addendum Report (PCB cleanup report)

Pages 2 to 3, Last bullet ("Revised figures showing: . . .")

- 1. Addendum. The sub-bullet under the Last bullet states that "Areas where cleanup levels were achieved, where the cleanup levels were not achieved and where soils contaminated with PCBs above the cleanup level were encapsulated. . . "The sub-bullet should be expanded to clarify that "encapsulated" soils are beneath the cap and the depth at which the "encapsulated" soils are located beneath the cap.
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- 3. Addendum. The Report states in page 3 that "An area measuring approximately 10 feet long by 10 feet wide by 2 feet below grade was excavated at each of three locations (PD-3, PD-4, and PD-5; see Figure 3)." However, the locations PD-3 through PD-5 are not depicted in Figure 3. In addition, the Report does not state whether the soils removed from PD-3 through PD-5 were disposed offsite or consolidated onsite. Please clarify the fate of the soils excavated from PD-3 through PD-5 and PD-1, PD-2, and PD-6.

Pages 9 to 10 of the Report:

4. Addendum. What is the in-situ PCB concentration for soils in EXC-PCB2, EXC-PCB3, EXC-PCB4, and EXC4? In

addition, please also confirm the concentration of PCBs in soils from EXC4 that were mixed with soils from the other excavations. According to the report the soil was stockpiled and sampled for PCBs to determine the PCB concentration for disposal. And the soils were disposed of at the Republic Services Keller Canyon Landfill which is a construction debris landfill. The in-situ concentration and not the concentration of PCBs in the stockpiled soils should had been used to determine the disposal method and facility as required in the regulations. Also, according to the report, EXC4 soils contained PCBs above 50 mg/kg. Please revise the Report to address the needed clarifications.

- 5. Addendum. The Report states that copies of manifest numbers: 005417521JJK, 005417522JJK, and 005417534JJK have not been received from Kettlemann. USEPA requested that Kettleman provide copies of those manifests. Attached are the pdf files containing that information.
- 6. Addendum. What was the PCB concentration in concrete and other debris consolidated at the site and disposed of at the Republic Services' Keller Canyon Landfill? Was the concentration of PCBs in each of the different materials (e.g., wood, concrete) below 50 mg/kg total PCBs?
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Page 5, Revised health risk screening calculations

9. Addendum. The report should explain the meaning of the estimated risk in context to the mitigation measures (e.g., cap) applied to the site to mitigate health risks. The protectiveness of the mitigation measures should be explained in context to the risk reduction that they provide.

Figures

10. Addendum. All figures must be revised to accurately depict the actual PCB residual concentrations and location of those concentrations at the site and actual areas where soils contaminated with PCBs above the cleanup level were consolidated. The figures must also be revised to accurately depict all sampling areas; and sample identification codes for samples representing remaining residual PCB concentrations at the site.

Soil Management Plan (SMP)

- 11. SMP. General comment. The soil management plan must be revised to reflect final conditions at the site and to be consistent with the final PCB cleanup report.
- 12. SMP. Section 4. Soil Remediation. The second paragraph in Section 4: "The most likely location for affected soil to be encountered during redevelopment activities is along the property boundary at the northwestern portion of excavation PCB3 and the property boundary at the northeastern portion of excavation EXC4." This paragraph is inconsistent with Figure 3 of the Addendum Report and must be revised.
- 13. SMP. The plan must be revised to include actions that will be taken to properly manage soils containing PCBs during post- redevelopment activities, such as during repairs to the cap and repairs to below ground utilities.

Draft Operation and Maintenance Plan for Cap Mitigation Measures (O&M Plan)

- 14. Cap O&M Plan. General comment. The Cap O&M Plan must be revised to accurately capture current conditions at the site and the final cap as described in the Addendum Report. The Cap O&M Plan, Addendum Report, Soil Management Plan, and Restricted Covenant should be accurate and the information presented not conflict among these documents. Figures presented in all these documents must present consistent and accurate data.
- 15. Cap O&M Plan. The cap is to be maintained in perpetuity.
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- 18. Cap O&M Plan. Section 4.1 (Periodic Inspections). Please describe the training that will be given to school staff proposed to conduct inspections of the cap and provide the qualifications of such personnel to conduct the cap inspections and repairs.
- 19. Please propose a convenient time for a conference call to discuss Section 4. (O&M Inspections), Section 5. (Intrusive Work Activities, Section 6. (Reporting and Recordkeeping), Section 7. (Site Access), and Section 8. (Variance, Modification, or Termination of O&M Plan).

Covenant and Environmental Restriction on 1009 66th Avenue, Oakland, California

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- 22. Covenant. In addition to referencing several documents in the covenant such as the Soil Management Plan, Operation and Maintenance Plan for the Cap, and Addendum Report, we recommend the following information be included in applicable articles of the covenant:
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 - Text explaining the cap must be operated, maintained, and repaired in perpetuity. Modifications to the cap require EPA approval before making the modifications.
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 - Cap monitoring (or inspection), maintenance, and repair activities including frequency of inspections and schedules for inspections and repairs. Revised cap inspection form.

- In case that a residential redevelopment is decided in the future to be built in the area of the Aspire school, additional soil cleanup may be necessary.
- Management of soils and contingencies when replacing vegetation (e.g., plants, shrubs, trees) in the planters.
- Revised legal descriptions including Parcel 1, Parcel 2, and the PCB Encapsulated Area.

•

23. Covenant. The revised covenant should undergo legal review before resubmitting the document for EPA review.

Please let me know if you have any questions concerning the above comments.

Sincerely, Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

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From: SANTOS, CARMEN <Santos.Carmen@epa.gov>

Sent: Tuesday, March 12, 2013 5:40 PM

To: Goloubow, Ron

Subject: RE: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and

Other Documents

Hello Ron:

Thank you for sending the Revised Addendum Report, I really appreciate it and will be reviewing it next week.

Attached is an example of the land use covenant recorded for a property where PCBs were left in place and a cap installed to cover the PCB contaminated soils.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com

ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608 T. 510.596.9550 | M. 510.501.1789 | F. 510.652.4906 www.arcadis-us.com

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Sent: Monday, December 10, 2012 5:04 PM

To: Goloubow, Ron

Cc: Wilson.Patrick@epamail.epa.gov

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Carmen D. Santos
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Sent: Tuesday, March 12, 2013 8:14 PM

To: Goloubow, Ron

Subject: RE: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and

Other Documents

Hello Ron:

I cannot complete my review without having all the revised appendices to the revised addendum report. Can you please send all the revised figures and other attachments. I would like to close out this project this month if possible.

Thank you for your courtesies and patience.

Sincerely,

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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Sent: Friday, March 01, 2013 12:34 PM

To: SANTOS, CARMEN

Subject: RE: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and Other Documents

Carmen I have completed the revisions to the addendum report. I am moving on to the soil management plan and operation plan. If you would like to review the revised text of the report; it is attached...

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com

ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608 T. 510.596.9550 | M. 510.501.1789 | F. 510.652.4906 www.arcadis-us.com

1

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Monday, December 10, 2012 5:04 PM

To: Goloubow, Ron

Cc: Wilson.Patrick@epamail.epa.gov

Subject: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and Other Documents

Hello Ron:

Below are my comments on several documents that you submitted for review. We discussed many of these comments during our conference call on December 7, 2012. Please make revisions responsive to the comments and consistent with the December 7, 2012 conference call.

Please send us a CD-ROM containing the appendices or attachments to the Addendum since the original CD-Rom appears to be defective.

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Pages 2 to 3, Last bullet ("Revised figures showing: . . . ")

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Page 5, Revised health risk screening calculations

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Soil Management Plan (SMP)

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- 13. SMP. The plan must be revised to include actions that will be taken to properly manage soils containing PCBs during post- redevelopment activities, such as during repairs to the cap and repairs to below ground utilities.

Draft Operation and Maintenance Plan for Cap Mitigation Measures (O&M Plan)

- 14. Cap O&M Plan. General comment. The Cap O&M Plan must be revised to accurately capture current conditions at the site and the final cap as described in the Addendum Report. The Cap O&M Plan, Addendum Report, Soil Management Plan, and Restricted Covenant should be accurate and the information presented not conflict among these documents. Figures presented in all these documents must present consistent and accurate data.
- 15. Cap O&M Plan. The cap is to be maintained in perpetuity.
- 16. Cap O&M Plan. Section 1.2.2 (Self-Implementing Cleanup Plan), Paragraph 6. The information presented in this paragraph is incomplete. Based on Figure 3 in the Addendum Report, PCBs above the cleanup level were left in place at

several locations in addition to the W1-WSDWall 2' and W2-WSDWall 2' areas.

- 17. Cap O&M Plan. A restrictive covenant has been prepared for EPA review and not a deed notification.
- 18. Cap O&M Plan. Section 4.1 (Periodic Inspections). Please describe the training that will be given to school staff proposed to conduct inspections of the cap and provide the qualifications of such personnel to conduct the cap inspections and repairs.
- 19. Please propose a convenient time for a conference call to discuss Section 4. (O&M Inspections), Section 5. (Intrusive Work Activities, Section 6. (Reporting and Recordkeeping), Section 7. (Site Access), and Section 8. (Variance, Modification, or Termination of O&M Plan).

Covenant and Environmental Restriction on 1009 66th Avenue, Oakland, California

20. Covenant. EPA should be a beneficiary and not a covenantee under the Covenant. Attached is an example template of a restrictive covenant for your use in revising the restrictive covenant for the Aspire site. A restrictive covenant is necessary for the site to ensure the cap is monitored, maintained, and repaired in <u>perpetuity</u>; and that proper procedures are in place for protection of human health and the environment in case the cap is breached to conduct post redevelopment activities such as repairs to underground utilities.

- 21. Covenant. The information in the covenant needs to be updated to reflect completion of the final PCB remedy at the site and revised cleanup completion reports..
- 22. Covenant. In addition to referencing several documents in the covenant such as the Soil Management Plan, Operation and Maintenance Plan for the Cap, and Addendum Report, we recommend the following information be included in applicable articles of the covenant:
 - Full description and survey coordinates for the cap.
 - Figure depicting accurate location and survey coordinates for cleanup verification samples that exceed the
 cleanup level; and location of consolidated soils containing PCBs. The current figures are not accurate and do not
 depict all locations where residual PCB concentrations above the cleanup level remain at the site. The exhibits to
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 - Additional figures as necessary.
 - Text explaining the cap must be operated, maintained, and repaired in perpetuity. Modifications to the cap require EPA approval before making the modifications.
 - Land use or zoning for the Aspire property.
 - Post-redevelopment management of soils that contain PCBs.
 - Cap monitoring (or inspection), maintenance, and repair activities including frequency of inspections and schedules for inspections and repairs. Revised cap inspection form.
 - In case that a residential redevelopment is decided in the future to be built in the area of the Aspire school, additional soil cleanup may be necessary.
 - Management of soils and contingencies when replacing vegetation (e.g., plants, shrubs, trees) in the planters.
 - Revised legal descriptions including Parcel 1, Parcel 2, and the PCB Encapsulated Area.
- 23. Covenant. The revised covenant should undergo legal review before resubmitting the document for EPA review.

Please let me know if you have any questions concerning the above comments.

Sincerely, Carmen

Carmen D. Santos **PCB** Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division **USEPA Region 9**

415.972.3360 santos.carmen@epa.gov

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From: SANTOS, CARMEN <Santos.Carmen@epa.gov>

Sent: Tuesday, March 12, 2013 8:25 PM

To: Goloubow, Ron

Subject: FW: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and

Other Documents

Attachments: LUC Submittal Ltr to USEPA 2-14-13.pdf

Hello Ron:

Attached is an example of a recorded land use covenant involving a site where PCB contaminated soils were left in place and covered with a cap. Please let me know if you have any questions concerning the attached information.

Thank you for your courtesies and patience.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: SANTOS, CARMEN

Sent: Tuesday, March 12, 2013 2:40 PM

To: 'Goloubow, Ron'

Subject: RE: PCBs: Aspire School Site, Oakland, CA - USEPA Comments on Addendum Report and Other Documents

Hello Ron:

Thank you for sending the Revised Addendum Report, I really appreciate it and will be reviewing it next week.

Attached is an example of the land use covenant recorded for a property where PCBs were left in place and a cap installed to cover the PCB contaminated soils.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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Carmen D. Santos PCB Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division USEPA Region 9 415.972.3360

santos.carmen@epa.gov

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From: Santos.Carmen <Santos.Carmen@epa.gov>

Sent: Thursday, March 21, 2013 2:26 PM

To: Goloubow, Ron

Subject: PCBs: Aspire School Site in Oakland

Hello Ron:

Please send me the contact information for whom we should send the letter approving the cleanup completion report. By tomorrow I will let you know if no further modifications are needed to the addendum report.

I look forward to your reply and thank you for your courtesies.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: Santos.Carmen <Santos.Carmen@epa.gov>

Sent: Thursday, March 21, 2013 3:18 PM

To: Goloubow, Ron

Subject: RE: PCBs: Aspire School Site in Oakland

Hello Ron:

Thank you for replying so quickly. Do you have a contact person at College for Certain, LLC? I want a contact that is directly responsible for the Aspire School and that has the authority to negotiate with EPA and Alameda County the land use covenant for that property. I will include Ms. Angela Andrews in the list to get an electronic copy of the letter. Is Mr. Mike Barr still the contact for College for Certain? If so, is the following the correct contact information for Mr. Barr (still need his correct e-mail address)?

College for Certain, LLC – Aspire Public Schools Chief Financial Officer 1001 22nd Avenue, Suite 100 Oakland, CA 94606

Please let me know if Mr. Barr is still the contact at College for Certain. Given most of our approvals for the PCB cleanup have been addressed to Mr. Barr or College for Certain, we would prefer to send our approval of the PCB cleanup to that organization if that organization is still above the Aspire School in Oakland.

Thank you for your courtesies. I look forward to your reply.

Regards, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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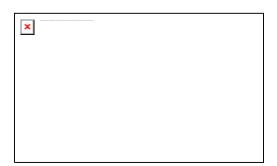
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Subject: PCBs: Aspire School Site in Oakland

Hello Ron:

Please send me the contact information for whom we should send the letter approving the cleanup completion report. By tomorrow I will let you know if no further modifications are needed to the addendum report.

I look forward to your reply and thank you for your courtesies.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360

santos.carmen@epa.gov

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which may be a computer program. This attached computer program could contain a computer virus which could cause harm to EPA's computers, network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced into the EPA network. EPA is deleting all computer program attachments sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you should contact the sender and request that they rename the file name extension and resend the Email with the renamed attachment. After receiving the revised Email, containing the renamed attachment, you can rename the file extension to its correct name.

For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

****************** ATTACHMENT NOT DELIVERED ***************

From: Santos, Carmen <Santos.Carmen@epa.gov>

Sent: Monday, March 25, 2013 3:47 PM

To: Goloubow, Ron

Subject: PCBs: Aspire Oakland - Revised Draft Cap OM Plan and Soil Management Plan

Hello Ron:

I have one more page to go to complete reviewing and commenting on the Soil Management Plan. Also, do you think it would be a good idea to combine the Soil Management Plan and the Cap Maintenance Plan into one document. The two issues are so interrelated that combining both plans into one might be an option to consider. Please let me know your thoughts on that idea.

Thank you for your courtesies and patience. I look forward to your reply.

Sincerely, Carmen

Carmen D. Santos
PCB Coordinator
USEPA Region 9 (WST-5)
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105
Voice: 415.972.3360
santos.carmen@epa.gov

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From: Goloubow, Ron [mailto:Ron.Goloubow@arcadis-us.com]

Sent: Monday, March 25, 2013 11:05 AM

To: Santos, Carmen

Subject: FW: Aspire Oakland - Revised Draft Cap OM Plan

Carmen the most recent version of the text for the Cap O&M plan is attached.

Ron.

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com

ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608 T. 510.596.9550 | M. 510.501.1789 | F. 510.652.4906 www.arcadis-us.com

From: Goloubow, Ron

Sent: Thursday, March 21, 2013 4:04 PM

To: 'Santos.Carmen'

Subject: Aspire Oakland - Revised Draft Cap OM Plan

On to the LUC!!

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From: Santos, Carmen <Santos.Carmen@epa.gov>

Sent: Monday, March 25, 2013 4:32 PM

To: Goloubow, Ron

Subject: PCBs: Aspire School Site - 1009 66th Avenue, Oakland, California - PCB Cleanup

Completion Report (Revised Addendum) - Follow Up and Additional Comments

Hello Ron:

Thank you for the opportunity to discuss with you my comments on ARCADIS' February 25, 2013 revised version of the PCB cleanup completion (revised Addendum Report). I have the following additional comments based on my March 22, 2013 review of the Soil Management Plan, internal consultation regarding soils contaminated with soluble lead, and additional review of the January 31, 2013 comments on a previous version of the Addendum Report sent to ARCADIS on that same date at 11:47 AM.

- 1. Please change the phrase "PCB-affected soils" to "PCB-containing soils."
- 2. Regarding the "Soil Disposal Summary" table in the Addendum, please change "Non-RCRA (Lead)" to "Hazardous soil (Lead)" until USEPA confirms if that waste was also legitimately regulated under federal RCRA and not just California state hazardous waste. Please provide a summary of the soil analysis results for lead.
- 3. Please revise the Addendum Report to be responsive to Comment 8 ("Addendum. Soil Disposal Summary") in the January 31, 2013 comments (sent to you via e-mail message at 11:47 AM) on the previous version of the Addendum Report.
- 4. Provide a CD-ROM containing all analytical data for additional site characterization and cleanup verification samples. To the best of our knowledge, that data has not been provided to USEPA. We need to conduct a focused review of the data as part of the approval of the cleanup completion report. That approval may not proceed without an opportunity to review the requested data. We need this data right away. Thank you for your attention to this matter.
- 5. As we discussed on a conference call with you subsequent to our transmission of the January 31, 2013 comments and before ARCADIS' submission of the February 25, 2013 revised Addendum Report, our preference is that such become the actual PCB cleanup completion report and other reports that might be available be referenced in the cleanup completion report and included in the CD ROM accompanying the PCB cleanup completion report. Also, all USEPA correspondence approving the additional characterization for PCBs and cleanup of PCBs at the Aspire School site be included in the CD ROM accompanying the cleanup completion report. The CD-ROM must also include all ARCADIS correspondence related to the PCB cleanup as well as that correspondence addressing design and construction of the cap. In our opinion, the Soil Management Plan and the plan for cap inspection, maintenance, and repair be included in the cleanup completion report as appendices to that report and both plans (or one plan addressing soil management and cap inspection, maintenance, and repair) be included in the CD ROM accompanying the cleanup completion report.

6. Please submit a read-line version of the cleanup completion report that is responsive to the comments we discussed on March 22, 2013 and additional comments included in this message. Also, please use our January 31, 2013 comments as a checklist to ensure that all USEPA comments on the cleanup completion report have been addressed in the redline version we are requesting via this message.

With the above additional comments on the PCB cleanup completion report and the many comments discussed with you on March 22, 2013 via conference call, we believe that College for Certain/ARCADIS can move forward with revisions to the February 25, 2013 cleanup completion report and submit a revised redline version of the cleanup completion report.

As to the revised Soil Management Plan, I prepared comments on March 22, 2013 and I am completing my comments on the last page of the document and will send those comments to you today. The word file will contain all the comments and changes we want made to the Plan. In addition, please consider the idea of combining the soil management plan with the plan for cap inspection, maintenance, and repair.

If you have any questions concerning this message, please call me at 415.972.3360.

Thank you for your courtesies and patience.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: Santos, Carmen <Santos.Carmen@epa.gov>

Sent: Monday, March 25, 2013 6:23 PM

To: Goloubow, Ron

Subject: FW: Soil Management Plan Aspire Oakland-2013-01-03-RV009155.doc

Attachments: Soil Managment Plan Aspire Oakland-2013-01-03-RV009155.doc; 03_25_2013 USEPA

Comments_Soil Manage Plan_Aspire_Arcadis_.docx

Hello Ron:

Thank you for the opportunity to comment on the attached Soil Management Plan for the Aspire School Site in Oakland, CA. My comments are electronically annotated in the attached file: "03_25_2013 USEPA Comments Soil management Plan Aspire ARCADIS.docx." If you have any questions concerning my comments, please call me.

In addition to the annotated comments, please revise the document in context to post redevelopment activities. If additional construction is planned or is currently anticipated to occur at the Aspire School site in the future, the SMP must include a standalone section addressing this possibility and how soil management (characterization, temporary storage, and disposal) will be conducted.

Therefore, also in context to potential future construction at the Aspire site (if that is anticipated), the Cap inspection, maintenance, and repair plan must address the possibility for future significant disturbance of the approved TSCA cap for the site. And in that situation, proper notification to that effect must be made to USEPA that includes the plans to modify the cap and protect those sections of the cap that will not be disturbed.

In general, the SMP seems to be written for site redevelopment when the site is already redeveloped. Please make appropriate adjustments to the plan so it will address the current status of the site and future post-redevelopment activities at the site. The SMP must also be consistent with the final PCB cleanup completion report for the Aspire site. Please also ensure that comments made on the previous version of the SMP and included in USEPA's January 31, 2013 e-mail message to you (sent at 11:47 AM) are addressed. In addition, the SMP must be consistent with USEPA's approvals dated November 13, 2009, April 5, 2011, June 11, 2011, and electronic e-mail messages not captured in those approval letters.

Please submit a red-line revised version of the SMP for review as soon as it is available.

Thank you for your courtesies and patience.

Sincerely, Carmen

Carmen D. Santos
PCB Coordinator
USEPA Region 9 (WST-5)
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105
Voice: 415.972.3360
santos.carmen@epa.gov

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From: Goloubow, Ron [mailto:Ron.Goloubow@arcadis-us.com]

Sent: Wednesday, March 13, 2013 10:53 AM

To: SANTOS, CARMEN

Subject: Soil Management Plan Aspire Oakland-2013-01-03-RV009155.doc

Hi Carmen – The revised soil management plan is attached. IF you could please make your comments on the attached word filed.

I am not on to the O&M plan and revising Figure 3...

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From: Santos, Carmen <Santos.Carmen@epa.gov>

Sent: Tuesday, April 02, 2013 9:06 PM

To: Goloubow, Ron

Subject: PCBs: Aspire Public School Oakland --- Cap O&M Plan

Attachments: 04_02_2013_USEPA Comments_Cap OM Plan_ARCADIS_Aspire_CollegeforCertain_.docx

Hello Ron:

Attached are our comments on the CAP O&M Plan. Please call me if you have any questions concerning the comments. I will be out of the office on business travel for the remaining of the week and will be back in the office on April 8, 2013.

Thank you for your courtesies and have a great day.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: Santos, Carmen <Santos.Carmen@epa.gov>

Sent: Monday, April 29, 2013 6:55 PM

To: Goloubow, Ron

Subject: PCBs: Aspire School, 66th Avenue, Oakland, CA ---- Status of Revised Documents

Hello Ron:

Hope this message finds you well. You have our comments on all the documents that you submitted for EPA's review. Please let me know the status of the revised versions of these documents and when should we receive them for review and approval. A revised land use covenant (LUC) is also necessary for review. We want to complete the review of the revised documents still to be submitted and LUC so that (1) an approval can be issued for the cleanup completion report and (2) agreements can be reached on the LUC that will facilitate recordation of the LUC. We want to close this PCB cleanup case within a month. We cannot keep waiting for the revised documents and keep re-engaging on this project. Such approach is inefficient and will affect work time already allocated for other projects and the schedule to complete those other projects.

Thank you for your courtesies and attention to this matter. I look forward to your prompt reply.

Sincerely, Carmen

Carmen D. Santos
PCB Coordinator
USEPA Region 9 (WST-5)
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105
Voice: 415.972.3360
santos.carmen@epa.gov

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From: Santos, Carmen <Santos.Carmen@epa.gov>

Sent: Thursday, June 27, 2013 7:02 PM

To: Goloubow, Ron Cc: Armann, Steve

Subject: FW: PCBs: Aspire School, 66th Avenue, Oakland, CA ---- Status of Revised Documents

Hello Ron:

I have not heard from you since May 3, 2013. Aspire / College for Certain need to submit the revised documents and revised LUC for review and approval. This case needs to be closed. Please provide the name, phone number, and e-mail address of the contact at College for Certain with whom we should discuss this matter and reach resolution.

Thank you for your courtesies.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: Goloubow, Ron [mailto:Ron.Goloubow@arcadis-us.com]

Sent: Friday, May 03, 2013 4:58 PM

To: Santos, Carmen

Subject: RE: PCBs: Aspire School, 66th Avenue, Oakland, CA ---- Status of Revised Documents

Carmen –The revisions to the text of the summary report is complete.

The EPA comments on the inspection plan still need to be addressed and the LUC needs to be prepared.

I totally agree with you that this work needs to get finished up and soon.

Thanks for your help on this project.

I am planning to spend time on these documents during the week of May 6, 2013 and will contact you with any questions.

Ron.

Ron Goloubow, PG | Principal Geologist | ron.goloubow@arcadis-us.com

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From: Santos, Carmen [mailto:Santos.Carmen@epa.gov]

Sent: Monday, April 29, 2013 3:55 PM

To: Goloubow, Ron

Subject: PCBs: Aspire School, 66th Avenue, Oakland, CA ---- Status of Revised Documents

Hello Ron:

Hope this message finds you well. You have our comments on all the documents that you submitted for EPA's review. Please let me know the status of the revised versions of these documents and when should we receive them for review and approval. A revised land use covenant (LUC) is also necessary for review. We want to complete the review of the revised documents still to be submitted and LUC so that (1) an approval can be issued for the cleanup completion report and (2) agreements can be reached on the LUC that will facilitate recordation of the LUC. We want to close this PCB cleanup case within a month. We cannot keep waiting for the revised documents and keep re-engaging on this project. Such approach is inefficient and will affect work time already allocated for other projects and the schedule to complete those other projects.

Thank you for your courtesies and attention to this matter. I look forward to your prompt reply.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: Santos, Carmen <Santos.Carmen@epa.gov>

Sent: Friday, August 30, 2013 4:00 PM
To: Goloubow, Ron; Angela Andrews
Cc: Lieben, Ivan; Armann, Steve

Subject: PCBs: Revised PCB Cleanup Completion Report and Covenant - Aspire School - 66th

Avenue, Oakland, CA

Dear Mr. Ron Goloubow and Ms. Angela Andrews:

As of June 2013 we have not received the revised PCB cleanup completion report for the subject Aspire School despite our repeated requests for those documents during the last two years. Conditions of approval in EPA's approval of the PCB cleanup work requires that such a report be submitted in addition to a land use covenant, cap inspection, maintenance, and repair plan for review and approval of the language prior to recordation of the covenant. We have reviewed all the draft documents and have provided Mr. Goloubow with comments on such documents. Those comments were also discussed with Mr. Goloubow through conference calls.

In order to determine the PCB cleanup conducted at the Aspire School property in Oakland (66th Avenue) was completed consistent with all conditions in EPA's PCB cleanup approval for the Aspire property, the required PCB cleanup completion report, cap inspection, repair, and maintenance plan, and land use covenant must be submitted for EPA approval. The Alameda County Department of Health must also be included in the review of those documents. Lacking the required documentation, EPA cannot make such a determination. In addition, cap requirements include routine inspections of the cap which in this case consists of all paved areas at the school. Please provide copies of cap inspection reports conducted since completion of the cap.

We are requesting the required documents be submitted not later than October 15, 2013. In replying to this message, we would greatly appreciate you providing an appropriate contact for College for Certain as well as the contact information for the legal counsel with whom we could discuss the above matters.

Thank you for your courtesies.

Sincerely,

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: Santos, Carmen <Santos.Carmen@epa.gov>
Sent: Wednesday, September 18, 2013 12:05 PM

To: Goloubow, Ron; Angela Andrews Cc: Lieben, Ivan; Armann, Steve

Subject: RE: PCBs: Revised PCB Cleanup Completion Report and Covenant - Aspire School - 66th

Avenue, Oakland, CA

Hello Ron:

Thank you for writing regarding the Aspire cleanup completion report.

We had provided significant comments on previous versions of the Addendum Report and have commented earlier this year on the technical content and lay out of the report. Our preference is that such report not be referred to as an Addendum report but as a cleanup completion report that includes as an attachment the report that was prepared before all the actual final steps of the physical cleanup of the Aspire property was completed. Therefore, our expectations are to receive the documents listed in your message and those documents being responsive to all the comments that have been provided to ARCADIS. Responses to EPA's comments are fine, however, the cleanup completion report needs to be revised and the revisions responsive to those comments.

Please refer to our messages from 2012 and earlier in 2013 regarding technical issues with the cleanup completion report. In addition, the cleanup completion report needs to be consistent with USEPA's requirements for such report established in the conditional approval of the cleanup activities.

The information presented in your message, if the same as in the last version of the report that we reviewed last year and earlier this year, then that information seem to be adequate as long as it is responsive to all the comments that we already provided in the previous versions of the cleanup completion report. The report should also include a table as to how and if Aspire met each of the conditions of approval. Any deviations from those conditions, if any, should also be explained.

Thank you for your courtesies and please call or write if you have any questions concerning this message.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov

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From: Goloubow, Ron [mailto:Ron.Goloubow@arcadis-us.com]

Sent: Monday, September 16, 2013 1:21 PM

To: Santos, Carmen; Angela Andrews **Cc:** Lieben, Ivan; Armann, Steve

Subject: RE: PCBs: Revised PCB Cleanup Completion Report and Covenant - Aspire School - 66th Avenue, Oakland, CA

Team - ARCADIS is in to process of revising the documents for the Aspire School Site in Oakland and I want to make sure we are in agreement as to what is going to be provided to the EPA on or before October 15, 2013. Here is my understanding as to what will be provided for EP's review.:

Revised DRAFT Addendum to the PCB Cleanup Completion Report

This document will include responses to the comments provided by EPA in March 2013.

As a reminder this report provides the following

- Summary of additional remedial actions conducted following the submittal of the Implementation Report (dated August 12, 2010)
- A summary of the PCB-affected soil that remains at the Site
- Summary of mitigation measures for the PCB-affected soil that remains at the Site;
- Soil sample laboratory analytical data;
- Revised health risk screening calculations;
- Fill material source information and laboratory analytical data
- Waste disposal information and
- Revised figures showing:
 - Details regarding the surface cap, the landscaped areas, and the redevelop plan);
 - Survey coordinates for the location of soils beneath the cap containing PCBs at concentrations above the cleanup level of 0.130 milligrams per kilogram and
 - Areas where cleanup levels were achieved, where the cleanup levels were not achieved, and where soils
 contaminated with PCBs above the cleanup level were consolidated beneath the cap at depths ranging from
 approximately 1 to 4 feet below the current ground surface.

The addendum, along with the Implementation Report, will provide a comprehensive summary of the SICP.

Revised Draft Operation and Maintenance Plan for Cap Mitigation Measures

This document will include the schedule for cap inspection, cap maintenance, and cap repair and will include responses to the comments provided by EPA in March 2013.

Draft Land Use Covenant

This document is being prepared using the example document provided by EPA in January 2013.

Cap Inspection Report

The cap inspection report from September 2013

Please let me know if these are the documents that EPA is expecting.

Thanks Ron.

Ron Goloubow | Principal Geologist | ron.goloubow@arcadis-us.com ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608 T: 510 596 9550 | M: 510 501 1789 | F: 510 652 4906 Connect with us! www.arcadis-us.com | LinkedIn | Twitter | Facebook ARCADIS, Imagine the result

From: Santos, Carmen [mailto:Santos.Carmen@epa.gov]

Sent: Friday, August 30, 2013 1:00 PM **To:** Goloubow, Ron; Angela Andrews **Cc:** Lieben, Ivan; Armann, Steve

Subject: PCBs: Revised PCB Cleanup Completion Report and Covenant - Aspire School - 66th Avenue, Oakland, CA

Dear Mr. Ron Goloubow and Ms. Angela Andrews:

As of June 2013 we have not received the revised PCB cleanup completion report for the subject Aspire School despite our repeated requests for those documents during the last two years. Conditions of approval in EPA's approval of the PCB cleanup work requires that such a report be submitted in addition to a land use covenant, cap inspection, maintenance, and repair plan for review and approval of the language prior to recordation of the covenant. We have reviewed all the draft documents and have provided Mr. Goloubow with comments on such documents. Those comments were also discussed with Mr. Goloubow through conference calls.

In order to determine the PCB cleanup conducted at the Aspire School property in Oakland (66th Avenue) was completed consistent with all conditions in EPA's PCB cleanup approval for the Aspire property, the required PCB cleanup completion report, cap inspection, repair, and maintenance plan, and land use covenant must be submitted for EPA approval. The Alameda County Department of Health must also be included in the review of those documents. Lacking the required documentation, EPA cannot make such a determination. In addition, cap requirements include routine inspections of the cap which in this case consists of all paved areas at the school. Please provide copies of cap inspection reports conducted since completion of the cap.

We are requesting the required documents be submitted not later than October 15, 2013. In replying to this message, we would greatly appreciate you providing an appropriate contact for College for Certain as well as the contact information for the legal counsel with whom we could discuss the above matters.

Thank you for your courtesies.

Sincerely,

Carmen D. Santos PCB Coordinator USEPA Region 9 (WST-5) Waste Management Division 75 Hawthorne Street San Francisco, CA 94105 Voice: 415.972.3360 santos.carmen@epa.gov _____

Before printing this message and/or attachments, think if it is necessary. Think Green.

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